

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

IN RE:)
) Case No. 7:23-cv-00897
CAMP LEJEUNE WATER LITIGATION)
)
)
This Document Relates to:)
ALL CASES)
_____)

- - -
APRIL 3, 2025
- - -

Videotaped deposition of RODNEY KYLE
LONGLEY, Ph.D. conducted at The U.S. Department of
Justice, 411 W. Fourth Street, Suite 800, in Santa
Ana, California, commencing at 9:36 A.M. PST on the
above date before Pamela Cotten, CSR, RDR, Certified
Realtime Reporter, Certificate No. 4497.

- - -

A P P E A R A N C E S:

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(Appearances continued on the following page)

A P P E A R A N C E S (Continued):

ALSO PRESENT REMOTELY VIA ZOOM:

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U.S. DEPARTMENT OF JUSTICE

SARA J. MIRSKY, ESQ.
U.S. DEPARTMENT OF JUSTICE
SHARON SPRAYREGEN, ESQ.
U.S. DEPARTMENT OF JUSTICE

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ANNEMARIE MOORE, Ph.D.
Senior Research Associate
Morgan, Angel, Brigham & Associates, LLC
DENNIS REICH, ESQ.
PLG

I N D E X

Witness: KYLE LONGLEY, Ph.D.

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1 SANTA ANA, CALIFORNIA - THURSDAY, APRIL 3, 2025

2 9:36 A.M. PST

3 VIDEO OPERATOR KELLEY: We are now on the
4 record. My name is Michael Kelley. I'm a
5 videographer for Golkow, a Veritext division.

6 Today's date is April 3rd, 2025, and the
7 time is 9:36 a.m.

8 This video deposition is being held at 411
9 West Fourth Street, Suite 8000, Santa Ana,
10 California, in re Camp Lejeune Water Litigation
11 pending in the United States District Court for the
12 Eastern District of North Carolina.

13 The deponent is Kyle Longley, Ph.D.

14 The court reporter is Pamela Cotten.

15 Will everyone state their appearances
16 starting with the noticing attorney. Afterwards,
17 the court reporter will swear in the witness.

18 MR. GIBBONS: Hanley Gibbons for the United
19 States.

20 MS. HURT: Cindy Hurt for the United
21 States.

22 MR. HUGHES: John Hughes for the
23 plaintiffs.

24 VIDEO OPERATOR KELLEY: Will the Zoom
25 participants please state their appearances now.

1 MR. REICH: Dennis Reich for the
2 plaintiffs.

3 MS. LaMACCHIA: Leslie LaMacchia for the
4 plaintiffs.

5 MS. SPRAYREGEN: Sharon Sprayregen for the
6 United States.

7 MS. HURT: There's also for the United
8 States Jessica Ans, spelled A-n-s is the last name.

9 THE REPORTER: My name is Pamela Cotten. I
10 am a court reporter licensed by the Certified
11 Shorthand Reporters Board of the State of
12 California. My license number is 4497.

13
14 RODNEY KYLE LONGLEY, Ph.D.,
15 called as a witness, and having been first duly
16 sworn in by the Certified Shorthand Reporter, was
17 examined and testified as follows:

18
19 EXAMINATION

20 BY MR. GIBBONS:

21 Q Good morning, Dr. Longley.

22 A Good morning.

23 Q My name is Hanley Gibbons. I represent the
24 United States.

25 Can you please state your full name for the

1 record.

2 A Rodney Kyle Longley.

3 Q Thank you.

4 And am I correct that you are performing as
5 a retained expert in history for the plaintiffs in
6 the Camp Lejeune Justice Act Litigation?

7 A Yes.

8 Q Dr. Longley, have you ever been deposed
9 before?

10 A No.

11 Q I'm going to go through a few ground rules
12 just for purposes of maintaining the record and
13 ensuring everyone is on the same page for today.

14 During today's deposition, the court
15 reporter is going to transcribe everything that we
16 say while we are on the record. In normal
17 conversation, it is typical that you might
18 understand what I'm about to ask before I finish my
19 question. I like to ensure everything is properly
20 transcribed. I'm going to ask that you please wait
21 until I'm done asking my question, pause briefly,
22 and then answer.

23 Do you understand?

24 A Yes.

25 Q Okay. I'm also going to ask that you

1 always answer my questions clearly and verbally.
2 For example, if I ask a yes or no question, please
3 affirmatively and verbally respond with a yes or a
4 no.

5 It can also be very difficult for the court
6 reporter to transcribe uh-huhs or huh-uhs, so please
7 make sure that you are always clear using yes or no.

8 Is that fair?

9 A Understood.

10 Q Okay. If you didn't hear my question,
11 please tell me, I'll clarify or I'll rephrase it.
12 If you answer a question, I'm going to assume that
13 you understood it.

14 Is that fair?

15 A Fair.

16 Q Okay. Do you understand that a few minutes
17 ago you took an oath to tell the truth?

18 A Yes.

19 Q Okay. And you understand that this is the
20 same oath that you take in court, subject to the
21 penalties of perjury?

22 A Understood.

23 Q Okay. You can correct your testimony at
24 any time while we are here today. After a few days,
25 after the deposition is complete, you are going to

1 be given a copy of the transcript to review. Your
2 attorneys will also explain the process for making
3 any corrections to today's transcript, and then you
4 will be asked to sign it.

5 A Understood.

6 Q Okay. I plan to take breaks roughly every
7 hour, but if you need a break at any point, please
8 just let me know. The only exception would be if I
9 just asked a question, I ask that you please finish
10 responding to the question and then take a break.

11 A Understood.

12 Q Is there any reason that you might have
13 difficulty recalling information today?

14 A No.

15 Q Okay. From time to time your counsel may
16 object. After any objections, I'm going to ask that
17 you please answer the question. The objections are
18 purely to register for the record.

19 The only exception would be if your counsel
20 instructs you specifically not to answer on the
21 basis of privilege or attorney work product.

22 Is that clear?

23 A Understood.

24 Q Okay.

25 ///

1 (The document referenced below
2 was marked Deposition Exhibit 1 for
3 identification and is appended
4 hereto.)

5 BY MR. GIBBONS:

6 Q To begin, I'm going to show you what's been
7 premarked as Longley Exhibit 1, which is the notice
8 of your deposition today.

9 Dr. Longley, do you recognize this
10 document?

11 A Yes.

12 Q And you have seen this notice before today?

13 A Yes.

14 Q Can you please turn to Attachment A, which
15 I believe begins on page 5 of the exhibit. The
16 document states:

17 "Pursuant to Federal Rules of
18 Civil Procedure 30(b)(2) and 45, the
19 United States makes the following
20 requests for production of
21 nonprivileged documents,
22 communications, materials, including
23 but not limited to any electronically
24 stored information, data, technical
25 files, and photographs within your

1 possession, custody, or control."

2 Number one: "All emails,
3 correspondence text messages,
4 conversations, chats, voicemails,
5 data, technical files, or other
6 communications pertaining to
7 Camp Lejeune sent or received prior to
8 your retention as an expert in this
9 matter, including but not limited to,
10 from, or with: a. Morris Maslia,
11 b. Robert Faye, c. Jason Sautner,
12 d. David Savitz, e. Rene Suarez-Soto,
13 f. Susan Martel, g. Scott Williams,
14 h. Frank Bove, i. Mike Partain,
15 j. Jerry Ensminger, k. Lori
16 Freshwater, and l. Paul Rosenfeld."

17 Did I read that correctly?

18 A Yes.

19 Q Do you have any such documents or
20 correspondence in your possession?

21 A No.

22 Q Okay.

23 Number 2: "All emails, letters,
24 correspondence, text messages,
25 conversations, chats, voicemails, or

1 other communications to, from, or with
2 any individual who has filed a claim
3 with the Department of the Navy or the
4 Eastern District of North Carolina
5 pursuant to the Camp Lejeune Justice
6 Act of 2022.

7 Did I read that correctly?

8 A Yes.

9 Q Do you have any such documents?

10 A No.

11 Q Number 3: "All bills, invoices,
12 or other documents reflecting
13 compensation paid to Kyle Longley,
14 Ph.D., related to the Camp Lejeune
15 Justice Act litigation."

16 Did I read that correctly?

17 A Yes.

18 Q Apart from the materials that were provided
19 this morning, do you have any such documents in your
20 possession?

21 A No.

22 Q Okay.

23 And Number 4: "The most
24 recent resume or CV describing the
25 educational and professional

1 background of Kyle Longley, Ph.D."

2 Did I read that correctly?

3 A Correct.

4 Q And your CV has been produced already?

5 A Yes.

6 Q Okay.

7 A To my knowledge.

8 Q Okay. And Number 5: "All
9 course names, course syllabi, and
10 other course material for -- course
11 material lists for any classes,
12 courses, or seminars taught by Kyle
13 Longley, Ph.D., within the last ten
14 years."

15 Did I read that correctly?

16 A Correctly.

17 Q Okay. Do you have copies of such
18 materials?

19 A I -- those are contained within the CV with
20 the exception of the course syllabi.

21 Q Okay. Do you still have access to those
22 course syllabi?

23 A I should.

24 Q Okay. Do you know if this course syllabi
25 has been produced?

1 A Not to my knowledge.

2 Q Okay.

3 A But can be easily done.

4 Q Okay.

5 MR. GIBBONS: John, I'm going to ask that
6 those syllabi be produced after today's deposition.

7 MR. HUGHES: Okay. Let me do, I guess, an
8 objection that will open up an issue.

9 Number 2, so as to emails, communications
10 with any individual who filed a claim, Dr. Longley
11 has had some communications with -- let me think --
12 he had a communication, an email from Mike Partain
13 that was produced. Partain and Ensminger occupy a
14 few roles in this case. They do have their own
15 claims, so in that case they could be viewed as
16 individuals who filed a claim with the Navy or
17 Eastern District, but they also have a role as fact
18 witnesses. They also have a role as nontestifying
19 consultants. And so I objected to this request to
20 the extent that it would implicate emails with --
21 involving me as an attorney, Longley as an expert,
22 and nontestifying consultants in that role.

23 So that's what I wanted to say.

24 MR. GIBBONS: Okay. That clarifies things.
25 I appreciate that. We received your objection, but

1 we didn't have that level of specificity. Thank
2 you.

3 MR. HUGHES: Yes, sir.

4 BY MR. GIBBONS:

5 Q Dr. Longley, did you do anything to prepare
6 for your deposition today?

7 A Just reviewed documents.

8 Q Okay. Did you speak to anyone before
9 today's deposition about today's deposition?

10 A Other than John, but not directly related
11 to the deposition.

12 Q Okay. How many times did you meet with
13 Mr. Hughes prior to today's deposition?

14 A Once.

15 Q Okay.

16 A As well as picking him up. That's about
17 it.

18 Q Okay. Fair enough.

19 Did you speak to any other attorneys
20 preparing for your deposition today?

21 A No.

22 Q Okay.

23 A Would you prefer it to be Mr. Hughes or
24 John?

25 Q Whatever is more comfortable with you.

1 A Okay.

2 Q I'm, for professional reasons, going to
3 refer to him as Mr. Hughes when I'm asking a
4 question. If I address him directly, I'll address
5 him as John.

6 A Okay.

7 Q Other than in your reports, did you review
8 any documents preparing for your deposition today?

9 A No.

10 Q Okay. Did reviewing your reports refresh
11 your recollection for today?

12 A Yes.

13 Q Do you have any changes to the opinions
14 expressed in any of your reports apart from the
15 errata sheet we signed prior to going on the record?

16 A Not from -- with the exception of the
17 errata sheet, no.

18 Q Okay. Have you reviewed any other
19 depositions taken in this case?

20 A No. Well, let me ask you for
21 clarification. Depositions related to -- I mean,
22 things beyond what I already included in here?

23 Q Any depositions whatsoever, whether that be
24 expert reports, either from other plaintiff experts,
25 United States experts' reports, or deposition

1 testimony of any of the plaintiffs.

2 A Yes, I have reviewed those.

3 Q Okay.

4 A As well as the Kelman and the Brigham
5 reports.

6 Q Okay. So have you reviewed the deposition
7 of Dr. Jay Brigham?

8 A Yes. Well, no, I have not received the
9 deposition. I've only received the report.

10 Q Okay. The deposition of Dr. Ari Kelman?

11 A No.

12 Q Okay. What about the deposition of
13 Dr. David Sabatini?

14 A I don't recognize that name, I'm sorry.

15 Q Regarding witnesses, the deposition of
16 General Anthony Zinni?

17 A Reviewed.

18 Q Deposition of Lieutenant Colonel, Retired,
19 William Walters?

20 A Reviewed.

21 Q Deposition of Mr. David Greer?

22 A Reviewed.

23 Q Allan Howard?

24 A Reviewed.

25 Q Gary McElhiney?

1 A Reviewed.

2 Q Jacqueline Tukes?

3 A Reviewed.

4 Q I'm sorry, I need to go back to
5 Mr. McElhiney for a moment.

6 Did you realize that there were two
7 depositions of Mr. McElhiney?

8 A Not to my knowledge. I can't remember.

9 Q Okay.

10 A Again, lots of material reviewed on a very
11 short period of time.

12 Q Okay. We'll come back to that.

13 A Okay.

14 Q Benjamin Urquhart?

15 A Yes. Reviewed.

16 Q Ernest Hunt?

17 A Don't recognize that name.

18 Q Mark Cagiano?

19 A Don't recognize that name. Again, my
20 memory could be failing me.

21 Q Okay. Richard Benz?

22 A I don't remember that one either.

23 Q Okay. Are there any other plaintiff
24 depositions that you are aware of?

25 A Not off the top of my head.

1 Q Okay. Who provided those depositions to
2 you?

3 A They were provided by the plaintiffs.

4 Q Okay. By attorneys --

5 A Yes.

6 Q -- or -- okay.

7 Which attorneys provided them to you?

8 A I don't remember exactly who provided them.
9 I may have also seen them -- I just don't remember
10 on that.

11 Q Okay. Did you request those depositions or
12 were they affirmatively offered to you?

13 A I'm pretty much sure I asked for
14 information on broader issues than they were
15 provided.

16 Q Okay. Did you request any other
17 depositions after reviewing those?

18 A I can't remember any.

19 Q Okay.

20 A I think we ran out of time.

21 Q Did you provide any context for which
22 depositions you would like to review?

23 A Yes, I did provide information.

24 Q What types of things were you looking for
25 in depositions?

1 A Use of water buffaloes, for example.

2 Use -- or descriptions of life on base.

3 Q Okay. Apart from the depositions, you
4 interviewed several plaintiffs. Is that correct?

5 A That is correct.

6 Q Which plaintiffs did you interview?

7 A Allan Howard, Jerry Ensminger, Mike
8 Partain.

9 Q Okay. Were there any others?

10 A Not to my memory.

11 Q Okay. Were there any non-plaintiffs that
12 you interviewed?

13 A I'm trying to think. Yes. One.

14 Q Who was that?

15 A A Marine officer in my graduate program,
16 Dane Hanson, who had served at Camp Lejeune. Mainly
17 for background information.

18 Q Are there any notes from that interview?

19 A I'd have to look, but I don't think so. I
20 think it was more informal conversation.

21 Q Okay.

22 A It wasn't a formal oral history or
23 anything.

24 Q Okay. Did Mr. Hanson know that you were
25 interviewing him for purposes of an expert report on

1 Camp Lejeune?

2 A Yes. I should qualify that's Colonel Dane
3 Hanson, retired Marine Corps.

4 Q Okay. That's colonel, not lieutenant
5 colonel, correct?

6 A Colonel, yes, to the best of my knowledge.

7 Q Let's talk a little bit more about Colonel
8 Dane Hanson. What kind of information did you
9 discuss during your interview?

10 A Just what life was like on the base in the
11 early 2000s as a point of comparison to what I had
12 been reading.

13 Q And what did Colonel Hanson tell you?

14 A Pretty much what I found in my research
15 about the interactions, where people went, what they
16 did. His feelings about Jacksonville, you know,
17 things like that.

18 Q Let's talk about his feelings about
19 Jacksonville.

20 A Uh-huh.

21 Q What did he describe about Jacksonville?

22 A It wasn't for sure Oceanside, Carlsbad, or
23 San Diego. He said he tried to keep many of his
24 young people out of Jacksonville because it was
25 trouble.

1 Q Okay.

2 A But, again, that is in the context of
3 2000s.

4 Q Right. You said early 2000s. Do you have
5 a more precise measurement?

6 A I don't. I'd have to ask him for his exact
7 dates. Again, it was very informal. Early stages,
8 trying to just get a feel for what Camp Lejeune was.

9 Q Okay. You said it was early on. Roughly
10 when did you speak to Colonel Hansen?

11 A Probably August to September.

12 Q Okay. What was -- if you had to estimate,
13 how long did you spend talking to Colonel Hanson?

14 A Thirty, 35 minutes.

15 Q Okay.

16 A Just a quick phone call.

17 Q What did Dane Hanson about any movements
18 around the base or actions around the base?

19 A Much like what I described in my report.
20 Significant movement across the base.

21 Q Okay.

22 A No matter where you were stationed -- where
23 your home might have been, you were in constant
24 movement across the base.

25 Q Okay.

1 A There was no sedentary nature to it.

2 Q Understood.

3 Were there a lot of cars on Camp Lejeune by
4 the early 2000s?

5 A More so than what we saw in the '50s and
6 '60s, you know, and the enhancement which I've
7 outlined in my report. By the mid to late '70s you
8 start to see more, and by the '80s they're more
9 present, which I'm in agreement with the government
10 expert, Mr. Brigham, on that, that there was an
11 increase in automobiles over the time. Although
12 part of the problem is determining how many of those
13 were civilians coming to work on base versus how
14 many were those of people stationed on base.

15 Q Sure. We will come back to the car
16 discussion.

17 Did you discuss the bus system on
18 Camp Lejeune with Colonel Hanson?

19 A No.

20 Q Okay. Did he give any indication that
21 there was still an active bus system on
22 Camp Lejeune?

23 A We didn't go there. Again, it was early in
24 the research. I didn't have it formulated. It was
25 more, like I said, trying to get a feel for the

1 base.

2 Q Okay.

3 A Again, one of my graduate students. It was
4 an easy person to talk to who I knew had been
5 stationed at Camp Lejeune.

6 Q Just to be sure, was there anyone else that
7 you had spoken to besides those plaintiffs and
8 Colonel Hanson about Camp Lejeune?

9 A No.

10 Q Okay.

11 A Or at least not to my knowledge.

12 Q Okay. Dr. Longley, have you ever testified
13 in a trial before?

14 A Yes.

15 Q Okay. Which trials?

16 A I testified in Portland last May, and, I'm
17 sorry, I don't remember the name off the top of my
18 head, but it was regarding a military base access in
19 South Korea in the early 1970s. That's the most
20 recent.

21 I've testified in a death-sentencing case
22 of a Vietnam veteran in Tucson, but that's been at
23 least a decade ago.

24 Q Okay.

25 A And then the immigration cases, which I've

1 outlined, but those tend to be less testimony and
2 more writing declarations.

3 Q Okay. And we will turn to those in a
4 minute.

5 A Okay.

6 Q About this Portland case, can you give me a
7 brief overview of what the case was and what your
8 role was in the case.

9 A Yes. It involved a South Korean national
10 claiming to have come on U.S. military bases and
11 gone to PXs where she purchased baby powder. Baby
12 powder, which has now been linked to cervical cancer
13 and other issues.

14 My role and responsibility was to discuss
15 whether South Korean nationals would have access in
16 the 1970s to the PX and, if they had access, what
17 could they have purchased.

18 Q Okay. And was that Lee v. Bi-Mart?

19 A Yes.

20 Q And what were your findings and conclusions
21 in that case?

22 A After interviewing the commanding officer
23 of the camp, which is now not there anymore, in
24 Busan, the argument was this was highly unlikely
25 that a South Korean national would enter a PX and be

1 able to make massive purchases, if any purchase.

2 Q Okay. And what kinds of research did you
3 do for that case besides interviewing the commanding
4 officer?

5 A It was -- let me qualify that. That was
6 commanding officer by the late '70s.

7 Q Okay.

8 A But I also interviewed a civilian whose
9 family had lived -- a dependent of a military
10 officer in South Korea at the time. That was the
11 other interview. But a lot of it was looking at
12 government documents, studying the history of the
13 base. Camp Humphrey I believe was the name of the
14 camp. It is not, again, there any longer. So
15 government documents. Newspapers when possible.

16 Q Got you.

17 A Unfortunately, in the case of Oregon law,
18 you only get a few weeks to prepare.

19 Q That is unfortunate.

20 A Yeah. So it was a very quick turnaround
21 needless to say. I think they have a rule regarding
22 speedy trial.

23 Q When you say "a quick turnaround," can you
24 give an estimate of how long you had to prepare?

25 A Six weeks.

1 Q Okay.

2 A And that's a guess. I think it might have
3 actually been shorter.

4 Q Okay. How does that compare to the amount
5 of time you had to work on the Camp Lejeune
6 litigation?

7 A I started the Camp Lejeune litigation in
8 July, mid-July.

9 Q Okay.

10 A So we're talking a very quick turnaround
11 also in a comparative sense.

12 Q And that would be July of 2024, correct?

13 A Yes.

14 Q Okay.

15 A Let me qualify it. A quick turnaround in
16 comparison to my normal research projects.

17 Q Okay. When you say "normal research
18 projects," can you elaborate on what kinds you --

19 A Articles, essays, books. And of course
20 each having its own length of time. As I noted I
21 think, in my third report, one of the books I worked
22 on for 13 years.

23 Q That was Grunts, correct?

24 A Morenci Marines.

25 Q Let's talk a little bit more about the

1 immigration cases.

2 A Uh-huh.

3 Q So you said you haven't testified in these
4 immigration cases?

5 A No. Typically you don't testify.

6 Q Typically not. Okay.

7 A But if it is done, it is typically done by
8 Zoom or telephonically.

9 Q Okay. About how many of those immigration
10 cases did you testify in?

11 A Probably 20 percent of the ones that I've
12 listed. Again, I don't have an accurate count
13 because a lot of times that would be called in, have
14 to sit. In fact, two weeks ago I sat in 5:30 a.m.
15 in the morning out of a New York case and they
16 didn't end up calling me. The Government stipulated
17 to my expertise.

18 Q Okay.

19 A So it depends how you qualify what
20 constitutes testimony.

21 Q Understood.

22 And I believe you said that most of your
23 work in those immigration cases is usually in the
24 form of completing declarations?

25 A Yes.

1 Q Okay. What is the content of those
2 declarations generally?

3 A It will depend upon the individual case.

4 Q Okay. Can you give me a few examples?

5 A Yes. Convention against torture ones.
6 Typically revolve around violence in the
7 individual's home country, that if they are returned
8 to their home country they will face significant
9 threats to their lives.

10 Others may revolve around issues of with --
11 it is called withholding of removal, which relate
12 to, if they are sent back, the quality of life,
13 which includes violence, and typically those revolve
14 around people who have U.S. citizen children. So I
15 will look at the education opportunities that will
16 be provided U.S. citizen children, healthcare,
17 quality of life, and the threats of violence.

18 Q Okay. Then how do you go about reaching
19 those conclusions for your declaration? Can you
20 walk me through your research process?

21 A Thirty years of expertise in the field of
22 Latin American history.

23 Q Okay.

24 A Going back to graduate school, which I had
25 a field in modern Latin American. Two books on

1 modern U.S.-Latin America relations.

2 Q Okay.

3 A Then continued research and continued -- I
4 still pay close attention to the region, which is
5 very close to my heart. Living in Southern
6 California, you can't help to do so because it is
7 such an important component of our life here in the
8 area.

9 Q Okay.

10 A But the research is typically done --
11 updated research, again, kept up to date over 30
12 years. It includes things like conversations with
13 former State Department officials, CIA. I have a
14 pretty deep network now after 30 years.

15 Q Okay. So what type of timeline are you
16 typically operating on for these calculations?

17 A It depends.

18 Q Okay.

19 A Some can be months; some can be weeks.

20 Q Okay.

21 A Needless to say, they have sped up
22 recently.

23 Q Understandably.

24 A Uh-huh.

25 Q So obviously with 30 years of experience,

1 you have a great wealth of knowledge that you are
2 relying upon, and you talk about how you are
3 constantly updating your research. If you had to
4 ballpark, what percentage of the information in
5 these reports comes from historical knowledge that
6 you have accumulated versus new research that you
7 are conducting on the basis for an individual
8 declaration?

9 A Probably 50-50.

10 Q 50-50?

11 A 50-50. Again, each case is different.
12 Each country is different.

13 Q Okay. When you are presented the fact
14 pattern or the -- strike that.

15 When you are presented the case that you
16 are asked to offer a declaration in, do you already
17 have a pretty good sense of what the conditions in
18 that country are before you begin your research?

19 A Yes.

20 Q And that's just based on your experience
21 and knowledge?

22 A Accumulated learning, existing knowledge.

23 Q Okay. Have you ever been involved in
24 litigation personally?

25 A No.

1 Q When did you begin serving as an expert
2 witness in general?

3 A Probably 15 years ago.

4 Q Okay. So that would be approximately 2010?

5 A Somewhere in there.

6 Q Okay.

7 A It started with immigration and then
8 expanded in other ways. Say, the death-sentencing
9 case sort of dropped in my lap because I was an
10 expert on the Vietnam War.

11 Q Okay. And I believe we covered this, but I
12 just want to make sure.

13 You said you began working on the
14 Camp Lejeune litigation as an expert witness in
15 July 2024, correct?

16 A Correct.

17 Q Okay. So that was approximately five
18 months before your first report?

19 A Correct.

20 Q Okay. What is your hourly rate in the
21 Camp Lejeune litigation?

22 A \$350 per hour.

23 Q Okay. And, again, I know we just received
24 your invoices this morning, but what is the total
25 amount that you billed to date for the Camp Lejeune

1 litigation?

2 A Approximately 72,000.

3 Q Okay.

4 A That includes, I believe, one that is --
5 one invoice that has not been paid yet.

6 Q Okay.

7 A But I'll let you guys do the adding. I'm
8 willing to correct that if we need to.

9 Q Okay. If you need to, that can either be
10 corrected today or on the errata sheet, that's fine.

11 A That's what I came up last night with in
12 terms of approximate.

13 Q Okay. So separately, not -- don't ask an
14 attorney to do math on the record, but approximately
15 how many hours have you spent working on this case?

16 A That would be 200 -- approximately 200
17 hours. That's what I billed. That doesn't
18 necessarily reflect all of the time spent.

19 Q Okay. If you did have to include all the
20 time spent, just an estimate, how much time do you
21 think you spent on this litigation?

22 A 300, 350 hours. And that's saying things
23 like driving down the road --

24 Q Okay.

25 A -- in your car yesterday on the way here

1 thinking about the case and how to organize the
2 narrative and, you know, just the overall.

3 Q Okay. That's like including internal
4 thoughts like -- I'm just going to term it like
5 shower thoughts --

6 A Yeah.

7 Q -- commuting thoughts?

8 A Yes, yes. Again, which you do with all
9 research projects.

10 Q Right.

11 A But a lot of hours.

12 Q Trust me, the litigation lives rent free in
13 my mind as well.

14 A Yes, you understand.

15 Q Does your payment at all depend on the
16 outcome of this case?

17 A No.

18 Q And how did you first become involved in
19 this litigation?

20 A I'm trying to remember. I think it was a
21 group reached out -- I'm trying to remember. I'm
22 sorry. I don't exactly remember. It's been a blur.

23 Q Okay.

24 A But I remember ultimately I think it was
25 through a group that pinpointed me and pointed me to

1 the plaintiffs group and then they reached out.

2 Q Okay. So --

3 A But I can't remember. I could be confusing
4 that with other litigation --

5 Q Okay.

6 A -- because I know that's how I did the one
7 in Portland is Expert Institute reached out to me
8 and then put me in contact with the lawyers
9 regarding the case. Again, I'm sorry, I don't --
10 it's been a blur.

11 Q That's fine.

12 So you said the Expert Institute reached
13 out in the Portland case?

14 A Yes.

15 Q What is the Expert Institute?

16 A I -- a headhunter basically for expert
17 witnesses. I think that's the best way I could
18 characterize it.

19 Q I'm just trying to piece together how this
20 happened. So generally the Expert Institute will, I
21 assume, review cases in which a historian might be
22 needed and then contact appropriate historians?

23 A Yes.

24 Q And --

25 A I don't think it went through that in this

1 group. I cannot remember.

2 Q Okay.

3 A But that's the kind of thing. A lot of
4 what I found is, like on the immigration and other
5 cases, people just do a search.

6 Q Okay.

7 A And when they search and find, for example,
8 myself as the executive director of the Society for
9 military history, that sort of puts -- and who has
10 written on the Marine Corps, I think that was --
11 again, I can't remember per se.

12 Q Okay. Do you happen to remember the
13 details of the group that reached out to you?

14 A I just remember it was Zach Mandell and
15 Leslie Manchock.

16 Q Okay.

17 A I'm butchering Leslie's name.

18 MR. HUGHES: Might be LaMacchia.

19 THE WITNESS: Like I say, a blur.

20 I believe they reached out and then I had a
21 meeting with the -- some of the leadership to decide
22 on whether I would be retained or not.

23 BY MR. GIBBONS:

24 Q Okay. Are you aware that Zach Mandell and
25 Leslie LaMacchia are attorneys?

1 A Yes.

2 Q And you are aware that they were part of
3 the plaintiffs' leadership group for Camp Lejeune?

4 A Absolutely.

5 Q When we were talking about the start date
6 in July of 2024, is that when you were first
7 contacted or is that when you were retained to be in
8 research?

9 A I had been contacted earlier. They had
10 decided not to go a certain route. And, again, I
11 can't give you any dates or anything like that. It
12 sort of fell to the wayside.

13 Q Okay.

14 A But I can't remember when that first
15 contact was.

16 But when they came back in July, then it
17 was -- the decision was made to retain me, and they
18 put me to work.

19 Q Okay. Obviously specific dates I know you
20 said are out. Was it more than six months before
21 you were retained?

22 A Yeah.

23 Q Okay. Was it more than a year before you
24 were retained?

25 A Right at.

1 Q Right at?

2 A I think. That's probably the closest.

3 Q Okay. So approximately summer of 2023?

4 A Somewhere in there.

5 Q Okay.

6 A But the decision was made not to go that
7 route, and then it came back full circle.

8 Q Okay. Were you given any explanation for
9 why they decided not to go that route initially?

10 A No.

11 Q Okay. Okay. After you were retained as an
12 expert, how frequently did you meet with plaintiffs'
13 counsel?

14 A I would have to look at my records, but
15 basically if they gave me a research question, just
16 like I would normally approach a research issue with
17 that question in mind, I formulated my research plan
18 and then worked it and periodically checked in with
19 them.

20 I think if you look at my invoices, you
21 will see I did note when I met with leadership.

22 Q Okay.

23 A Or with lawyers.

24 Q Okay. We will review those later.

25 A Yeah.

1 Q But just for a general sense, could you
2 estimate how frequently? Was that, like, once a
3 month? Once every two weeks?

4 A Once probably every two weeks.

5 Q Okay.

6 A Early on, and then it might have extended
7 after that.

8 Q Extended meaning it became less frequent or
9 more frequent?

10 A Less frequent.

11 Q Okay.

12 A Again, I needed to be able to do the
13 research before I could start the narrative.

14 Q Okay.

15 (The document referenced below
16 was marked Deposition Exhibit 2 for
17 identification and is appended
18 hereto.)

19 BY MR. GIBBONS:

20 Q Dr. Longley, I just entered your CV as an
21 exhibit. This is going to be Longley Exhibit 2.

22 Can you please take a minute to review the
23 exhibit.

24 Okay. Is this a complete and accurate copy
25 of your CV?

1 A Yes.

2 Q Okay. Is there anything you need to add or
3 change on the CV?

4 A I don't believe so.

5 Q If you think of anything during the
6 deposition --

7 A Right.

8 Q -- please just let me know and we can
9 correct that.

10 So I just want to go through your
11 educational background really quick.

12 So University of Kentucky Ph.D.,
13 August 1993. Did you have any particular focus in
14 your Ph.D.?

15 A U.S. foreign relations --

16 Q Okay.

17 A -- which interrelated with U.S. military.
18 Unfortunately, in Latin America they are
19 interrelated -- or integrated -- unfortunately.

20 Q So when you say U.S. foreign relations, you
21 mean within Latin American or broadly?

22 A Broadly. Global. Hence, why I have a
23 field also in Asia and Latin America.

24 Q Okay. Tell you what, it will be easier if
25 we go through just from the beginning.

1 So let's start with your undergraduate
2 degree. Angelo State University?

3 A Uh-huh.

4 Q Bachelor of Arts in history and
5 mathematics, correct?

6 A Correct.

7 Q Okay. Did you have a particular focus in
8 your history for undergraduate?

9 A American and Latin American, but also a lot
10 of Europe.

11 Q Can't get away from Europe with a Latin or
12 American history.

13 A No. They are all completely integrated.

14 Q And you graduated summa cum laude in
15 May 1997, correct?

16 A Correct.

17 Q And then your master's was in history and
18 comparative literature from Texas Tech University,
19 correct?

20 A Correct.

21 Q Was there a particular field of study for
22 history for your master's?

23 A U.S. foreign relations, U.S.-Latin American
24 relations.

25 Q And I assume there was some degree of

1 military history involved in that as well. Can you
2 elaborate a little bit more on that?

3 A That's a very good question. Anytime you
4 study Latin America, for example, the history of
5 U.S. military interventions in the region is
6 substantial. And so there was an overlap in many
7 ways. Study in the Marine Corps who was usually the
8 point of the sphere in places like the Dominican
9 Republic, Nicaragua, across the board. So I think
10 there -- you know, that was all interest in things
11 like the Cold War and military. And, again, U.S.
12 military bases in the region from Guantanamo to the
13 Panama Canal.

14 Q Okay. And I'm -- obviously there's a lot
15 of military involvement in those things.

16 Are there any particular types of, like,
17 military history that you are referring to in those
18 things? Like, is this -- I'm probably using some
19 terms of art incorrectly. Are there, like,
20 civil/military relationship studies, or can you
21 elaborate just a little bit more on the types of
22 military history you are talking about with those?

23 A Right. Civil/military is one because
24 that's oftentimes interrelated to how do you issue
25 control and maintain support in the local areas.

1 Military interventions. Anti-Americanism, which is
2 fundamental, unfortunately, in the region.

3 Military, again, interventions whether it
4 be the Dominican Republic in 1965. I mean, I can go
5 through a litany.

6 Q Okay.

7 A And then soft power, which is the use of
8 culture relations, social relations, economic
9 relations, things like the Alliance for Progress.

10 Q Now, during that time, did you begin to
11 study U.S. military bases or their impacts on
12 society at all, or did that generally come later?

13 A No, it was during this period. Again, you
14 can't study U.S.-Latin American relations without
15 understanding Panama Canal and the Military School
16 of the Americas or Guantanamo or, you know, the
17 constant efforts at military alliances in the
18 region.

19 Q Okay. That sounds generally like a
20 macro-level understanding of the military bases, but
21 that's not the same as like the micro level that you
22 were asked to explore in the Camp Lejeune
23 litigation, correct?

24 A It would be -- the bibliography would have
25 micro.

1 Q Okay.

2 A Studying the canal zone, for example, 1964,
3 the flag riots where U.S. Americans were attacked as
4 a result of a debate over whether the Panamanian
5 flag should fly to the canal zone.

6 Guantanamo, it has got a long -- very long
7 history, very interesting history. So I did read
8 extensively on those kind of issues because it is
9 related also to the anti-Americanism and the
10 nationalism that is very prominent in Latin America.

11 Q Okay. And then circling back to your
12 doctorate, the University of Kentucky, you said U.S.
13 foreign relations on a global scale. Is that
14 similar aspects of military history are involved?

15 A Yes. The bibliography, if you were to read
16 in U.S. Foreign Relations, will also include issues
17 like Okinawa and the military bases there or those
18 in the Republic of Korea all throughout the region.
19 Subic Bay. And so, yeah, there's layers.

20 Q Okay.

21 A I think that would be the best way to
22 describe it, layers. And especially post-1945 when
23 the United States expands its global presence
24 significantly. But beforehand, of course, Guam,
25 Puerto Rico, all the different periods.

1 Q Okay. Now, what was the topic of your
2 dissertation in your doctorate?

3 A My dissertation, the topic was U.S.
4 Relationship with a guy named Jose Figueres. He was
5 a Costa Rican nationalist. Also significant
6 interaction with Nicaragua, Panama. But it was a
7 focus on his nationalism. How he manipulated the
8 United States by using not force, not
9 anti-Americanism, but a variety of different levels
10 of soft power to maintain support even in the face
11 of other allies, American allies.

12 Q Okay. Interesting.
13 Did you receive any sort of specialized
14 training or concentration throughout your history
15 degrees, things like how to process archivable
16 materials or oral histories?

17 A Yes. Each graduate seminar would include
18 elements of that. Some more than others. For
19 example, on the dissertation, I did implement and
20 utilize oral histories, some of which were done in
21 Spanish, for the obvious reasons.

22 Q Okay. Are you fluent in Spanish?

23 A Not anymore.

24 Q Okay. Un poco?

25 A Un poquito.

1 Q When did you conduct your first oral
2 history as a historian?

3 A Probably '94. No. It would have to be
4 before because it was a dissertation. Probably '91.
5 '90, '91.

6 Q Okay.

7 A During the work on the dissertation.

8 Q Okay. So between your master's and your --

9 A Yes, when I was ABD. I'm sorry, I should
10 clarify. All but dissertation. I finished
11 qualifying exams and I went into dissertation,
12 research, and writing.

13 Q Okay.

14 A I'm sorry, I forget not everybody knows all
15 the acronyms.

16 Q Okay.

17 A Which I think you as a military officer
18 would understand.

19 Q Yeah.

20 The oral histories that you took in
21 Spanish, were those ever translated into English?

22 A No. They were held in my private
23 repository.

24 Q Okay. Do you still have the records of
25 those?

1 A Probably buried somewhere in the garage.

2 Q Okay. But do you have them?

3 A Yes.

4 Q You did record them at the time?

5 A I recorded them at the time. I probably
6 couldn't even find a machine to put them in right
7 now.

8 Q So they were recorded in audible form,
9 then?

10 A Yes.

11 Q Do you know if they were ever transcribed?

12 A Some were, but I can't remember which ones
13 and I would have to go back and, like I said, dig
14 through the garage. Somewhere they are there.

15 Q Okay.

16 A Because we don't give anything away.

17 Q Yeah.

18 A You know.

19 Q If they -- if you were able to locate them
20 and you were able to find a device that was able to
21 play them, would you still be able to understand
22 them today, even though you said you are no longer
23 fluent in Spanish?

24 A Yes.

25 Q Okay.

1 A I just need a couple of weeks to get my ear
2 back.

3 Q Makes sense.

4 A I'll be in Costa Rica this summer, so by
5 the end I'll be ready.

6 Q That must be nice.

7 A Yeah, it is a hard life.

8 Q Yeah.

9 Dr. Longley, have you ever served in the
10 military yourself?

11 A No.

12 Q Okay.

13 A My father did, but I didn't.

14 Q What branch of service was your father in?

15 A Army.

16 Q Were you alive when he was in the Army?

17 A No. He was drafted in the mid-1950s.

18 Q Okay. Korean War?

19 A He got there in the tail end. He didn't
20 actually serve in the combat zone, but they got shot
21 at enough times that it made an impact.

22 Q Understandable.

23 A Yeah. He said it was the hottest place on
24 earth and the coldest at the same time.

25 ///

1 (The documents referenced below
2 were marked Deposition Exhibits 3, 4,
3 and 5 for identification and are
4 appended hereto.)

5 BY MR. GIBBONS:

6 Q I'm going to introduce Exhibits 3 through
7 5.

8 Beginning with Exhibit 3, I've premarked
9 your December 7th, 2024, report. I can -- just go
10 through it and make sure it is a complete and
11 accurate copy.

12 A Okay. That does look complete.

13 Q Okay.

14 A Again, I can't -- spot-check.

15 Q That's fine.

16 And then Exhibit 4 should be a copy of your
17 January 13th, 2025, report.

18 A Right. The rebuttal.

19 Q Yeah. Can you please look through that and
20 make sure that appears to be a complete and accurate
21 copy.

22 A Yes.

23 Q Okay. And then same for Exhibit 5, which
24 should be a copy of your March 17th, 2025, report.

25 Does that appear to be a complete and

1 accurate copy?

2 A That does appear correct.

3 Q Okay. I know we covered this briefly
4 earlier --

5 A Uh-huh.

6 Q -- but sitting here right now, do you still
7 agree with all the statements and opinions and
8 conclusions reached in your December 7th report with
9 the exception of the errata sheet?

10 A Uh-huh.

11 Q Okay.

12 A I would add that I think I said in the
13 third report that I did accept that there were more
14 cars on campus -- on base after the '70s.

15 Q Okay.

16 A I think I note that in my first report, but
17 I would say that that seems to have been accentuated
18 and, if anything, maybe strengthened our argument in
19 terms of how people would have access to being able
20 to move across base.

21 Q Understood.

22 A But I think that's the only major thing.

23 Q Okay. And then you still agree with all
24 the opinions and statements in Exhibit 4, your
25 January 13th report?

1 A Yes.

2 Q Okay. Same question, Exhibit 5, your
3 March 17th report. Is that still complete and
4 accurate?

5 A Yes.

6 Q And you stand by all the conclusions and
7 opinions?

8 A I do.

9 Q Okay. Can I assume that these reports
10 contain the sum and substance of your intended
11 testimony in the Camp Lejeune matter?

12 A Yes.

13 Q Okay.

14 A With the exception of, you know, I will
15 continue to research and explore and hope to explore
16 a number of different areas in the future --

17 Q Okay.

18 A -- which is the historian's job. Again,
19 this was not a normal research project in a
20 comparative sense to what I normally do in terms of
21 timeframe.

22 Q Okay.

23 MR. GIBBONS: All right. We're at about an
24 hour. So why don't we take a ten-minute break right
25 now. This is a good transition point.

1 THE WITNESS: Okay.

2 MR. GIBBONS: Get up and stretch our legs
3 and we will come back.

4 VIDEO OPERATOR KELLEY: This is the end of
5 Media File Number 1. We are now going off the
6 record. The time is 10:32 a.m.

7 (Recess taken.)

8 VIDEO OPERATOR KELLEY: This is the
9 beginning of Media File Number 2. We are now going
10 on the record. The time is 10:45 a.m.

11 BY MR. GIBBONS:

12 Q All right. Dr. Longley, I want to talk to
13 you a bit about the preparation for your reports
14 that we just entered as exhibits.

15 Prior to being retained for the
16 Camp Lejeune litigation as an expert, can you go
17 over the extent of your knowledge of Camp Lejeune?

18 A A lot of it will relate to comparative
19 analysis of military bases throughout the country.
20 I use this in the classroom, maybe not per se
21 Camp Lejeune, but given our location here, Camp
22 Pendleton, which they are in some ways mirror images
23 of each other. And so a lot of the time through the
24 research and through the teaching, I would discuss
25 life on the base, especially foreign bases like

1 Subic Bay in the Philippines because, again, lots of
2 issues related -- both diplomatically and
3 militarily.

4 I think, you know, this is a 30-year
5 process. I can't go back and pinpoint each and
6 every time I utilized this, but Camp Lejeune has
7 always been important because, as I've worked on
8 especially Vietnam combat soldiers, both Lejeune and
9 Pendleton, given the Marine Corps' prominent role in
10 Vietnam, were involved. So I came across that many,
11 many times. Again, if you were to ask me exactly to
12 pinpoint it or -- you know, I taught at Arizona
13 State for 25 years, and the campus there was
14 populated by large numbers of veterans. I think at
15 one point we had 8,000 veterans on campus. Many of
16 them took my military history course, and we discuss
17 their experiences. Many ex-Marines are -- you are
18 never an ex-Marine. A retired Marine. And so, you
19 know, there would be times those kind of things
20 would arise there. Describe life on base. Describe
21 what you -- how your training came up. And the same
22 would go when I was doing research on combat
23 soldiers in Vietnam, looking at these different
24 things.

25 But, again, the Marine Corps was overly

1 represented in Vietnam, when you look at the
2 breakdown, versus the Army in terms of
3 proportionality. So, again, Camp Pendleton,
4 Camp Lejeune will were well represented as well as
5 Parris Island, the Marine recruiting depot in San
6 Diego.

7 Q Okay. So I want to be a little more
8 specific. You obviously have background in the
9 military bases in general. Did you know anything
10 about the detailed operations at Camp Lejeune? For
11 instance, would you know the different areas of
12 Camp Lejeune prior to beginning work on this
13 litigation?

14 A I knew broader strokes. I knew about, you
15 know, what groups operated out of Lejeune. For
16 example, I think probably one of the most memorable
17 is remembering the effect of Camp Lejeune on the big
18 bombings, something that happened when I was a
19 teenager. It was a very vivid memory, but I also
20 remember how Camp Lejeune was affected since the
21 majority of soldiers that came who died in Lebanon
22 during that bomb were from Camp Lejeune.

23 Q Okay. But not necessarily the day-to-day
24 lives or activities that were occurring on the base,
25 more just general knowledge of the units that are

1 present on the base and how outside events would
2 affect them?

3 A No. I would say probably a deeper
4 understanding.

5 Q Okay.

6 A Especially, again, studying the Vietnam
7 War, studying the experiences with the combat
8 soldiers because that was my focus was combat
9 soldiers. Not on the war itself, but on people who
10 fought in Vietnam. So I think I picked up those
11 kind of things, much like with Pendleton, along the
12 way. Like what was training like on base. Because
13 if you read my book Grunts, the American Combat
14 Soldier in Vietnam, you will see an explanation of
15 basic, then you go to AIT, which, again, Advanced
16 Infantry Training, and then being staged in Garrison
17 duty, and then being sent to Vietnam and coming
18 back.

19 Q Would you have had an understanding of what
20 schools or trainings occurred specifically at
21 Camp Lejeune?

22 A Yes. Oftentimes you would see things like
23 where the training forces were for recon and then
24 eventually MARSOC, special forces, of the Marine
25 Corps, which doesn't come until later, but I was

1 very familiar with that as well as some of the
2 people who had gone through there.

3 Q Okay.

4 A And life on a base and understanding that,
5 again, I hate to say this, but there's not a ton of
6 differences between the military bases. The Army,
7 of course, I've spent time at Fort Hood down at
8 Huachuca. Places like that. And having a general
9 list -- having a general understanding of what life
10 was like on the base, not only for the soldiers
11 themselves but their families.

12 Q Okay. So a lot of this seems to have been
13 knowledge that was accrued from interviews or oral
14 histories or discussions with service members. Did
15 you have any archival documents or books that you
16 had read on Camp Lejeune prior to beginning work on
17 this litigation?

18 A For example -- I'll just give you one.
19 Some of the general surveys like Allen Millet's
20 Semper Fi, which does talk about life on bases
21 because it is a history of the Marine Corps.

22 I probably could go back and remember more,
23 you know. They are not that -- I just actually saw
24 Dr. Millett in the elevator about four days ago, and
25 we discussed his work. He is the recognized expert

1 on the Marine Corps in terms of his long history.
2 Also a Marine officer, retired.

3 Q Okay. And so do I understand correctly
4 that you read Allen Millett's book Semper or --

5 A Semper Fi.

6 Q Yeah, Semper Fi.

7 A Semper Fidelis.

8 Q Semper Fidelis, the specific to Camp
9 Lejeune prior to being --

10 A It wasn't specific to Camp Lejeune, but it
11 has significant segments of the book, much like many
12 of the others. Because, again, when you really look
13 at it, the major bases are Lejeune, Pendleton,
14 Hawaii, and Okinawa for the Marine Corps, although
15 some of that is evolving now. Even going back to --
16 where did I see the other day, Peleliu. Peleliu, it
17 is an island in the Pacific, P-e-l-i-e-u [sic], I
18 believe is. There was a famous battle there in
19 World War II.

20 Q Peleliu.

21 A Peleliu.

22 MR. HUGHES: Folks, let me ask a question
23 on the record. Is Dr. Brigham attending this
24 deposition?

25 VIDEO OPERATOR KELLEY: I see a Jay

1 Brigham.

2 MR. HUGHES: Okay. I don't think DOJ asked
3 us permission for Dr. Brigham to attend the
4 deposition. What's been the protocol in the past?

5 MR. GIBBONS: Well, under CMO3, assistants
6 for either side are allowed to attend the
7 deposition. One second, I'll provide the specific
8 citation.

9 MR. HUGHES: I see a Deposition Protocol
10 Number 9 at the end it says, "and any person who is
11 assisting in the litigation."

12 MR. GIBBONS: Correct.

13 MR. HUGHES: So are we taking -- as long as
14 it is bilateral. So we are taking the position that
15 an expert for either side can attend a deposition
16 because they are basically staff assistant.

17 MR. GIBBONS: Staff assistant in the
18 litigation, correct.

19 MR. HUGHES: All right. I'm fine with that
20 as long as it goes both ways.

21 MR. GIBBONS: Okay.

22 MR. HUGHES: Keep going.

23 MR. GIBBONS: Just to clarify, so would you
24 like Dr. Longley to attend the remainder of
25 Dr. Kelman's deposition next week?

1 MR. HUGHES: I'm not sure it will be
2 necessary.

3 MR. GIBBONS: Okay.

4 MR. HUGHES: But go ahead. Y'all can keep
5 going with your questions.

6 MR. GIBBONS: Okay.

7 BY MR. GIBBONS:

8 Q Dr. Longley, I would like you to turn to
9 page 46 of Exhibit 3, which is your December 7th
10 report.

11 A Okay.

12 Q I'm sorry, 46.

13 A Yeah. I've got it.

14 Q In the last paragraph it says:

15 "From these secondary readings, I
16 gained a foundational understanding of
17 many topics related to military bases.
18 Once completed, I began intensive
19 research into the primary documents on
20 life at Camp Lejeune in the post-war
21 period. These include a major
22 research trip to Marine Corps archives
23 at Quantico, Virginia, which houses a
24 vast quantity of materials on all
25 subjects related to the 248-year-long

1 history of the Marines. It has a vast
2 bibliography on Camp Lejeune,
3 especially related to the private
4 collection of people stationed there
5 from World War II through the 1980s.
6 I reviewed 40 different private
7 collections of people with ties to
8 Camp Lejeune, many with multiple
9 folders of materials that included
10 letters, photographs, slides, and
11 other personal materials."

12 Did I read that correctly?

13 A Yes.

14 Q Which 40 private collections did you
15 review?

16 A I'd have to look at my notes on that.

17 Q Okay. Were those included in your reliance
18 materials?

19 A I don't know.

20 Q Okay.

21 A Or I can't remember.

22 Q Okay.

23 MR. GIBBONS: Counsel, I'm going to request
24 a copy of those notes after the deposition.

25 MR. HUGHES: What page are we looking at?

1 BY MR. GIBBONS:

2 Q Page 46 of the first report.

3 A Okay. We will follow up and see what else
4 we got in that regard.

5 Q Okay. Dr. Longley, are you familiar with
6 the American Historical Association --

7 A Yes.

8 Q -- or AHA?
9 Are you a member?

10 A Yes.

11 Q And you were on the program committee from
12 2014 to 2016, correct?

13 A Correct.

14 Q Are you familiar with the AHA's standards
15 of professional conduct?

16 A Yes.

17 (The document referenced below
18 was marked Deposition Exhibit 6 for
19 identification and is appended
20 hereto.)

21 BY MR. GIBBONS:

22 Q I'm going to hand you Exhibit 6.

23 Dr. Longley, do you recognize what
24 Exhibit 6 is?

25 A Uh-huh.

1 MR. HUGHES: Is that a yes?

2 THE WITNESS: Yes, I'm sorry. Yes.

3 BY MR. GIBBONS:

4 Q What is Exhibit 6?

5 A It is the statement on Standards of
6 Professional Conduct.

7 Q Okay. If you will turn to page 3, please.
8 The second paragraph begins:

9 "Honoring the historical record
10 also means leaving a clear trail for
11 subsequent historians to follow. Any
12 changes to a primary source or
13 published secondary work, whether
14 digital or print, should be noted."

15 Did I read that correctly?

16 A Yes.

17 Q "The ease of which digitally
18 preserved records are reproduced and
19 accessed facilitates this practice but
20 makes accurate citation even more
21 vital. This is why scholarly
22 apparatus in the form of
23 bibliographies and annotations (and
24 associated institutional repositories
25 like libraries, archives and museums)

1 is so essential to the professional
2 practice of history. Such an
3 apparatus is valuable for many
4 reasons. It enables other historians
5 to retrace the steps in an argument to
6 make sure those steps are justified by
7 the sources."

8 Did I read that correctly?

9 A Correct.

10 Q And then skipping down about six lines from
11 the bottom, you see the word "finally"?

12 A Uh-huh.

13 Q "Finally, the trail of evidence
14 left by any single work of history
15 becomes a key starting point for
16 subsequent investigations of the same
17 subject, and thus makes a critical
18 contribution to our collective
19 capacity to ask and answer new
20 questions about the past. For all
21 these reasons, historians pride
22 themselves on the accuracy with which
23 they use and document sources. The
24 sloppier their apparatus, the harder
25 it is for other historians to trust

1 their work."

2 Did I read that correctly?

3 A Yes.

4 Q Do you agree that it is important to
5 properly document and cite all the sources you
6 relied upon?

7 A As much is available and possible.

8 Q Are you familiar with Anthony Brundage's
9 "Going to the Sources: Guide to Historical Resource
10 Writing"?

11 A No.

12 (The document referenced below
13 was marked Deposition Exhibit 7 for
14 identification and is appended
15 hereto.)

16 BY MR. GIBBONS:

17 Q I'm going to introduce Exhibit 7.

18 Okay. If you will turn towards page 125.
19 It is about three-quarters of the way through the
20 exhibit.

21 Do you see where it says "Footnoting"?

22 A Yes.

23 Q It reads, beginning of the second sentence:
24 "In regard to the former, most
25 students are fully aware that all

1 quotations must be footnoted; it is
2 the actual footnoting of the other
3 material that raises problems. Should
4 each fact be footnoted? To do so
5 would be to encumber your text with
6 thick clusters of numbers and a
7 corresponding long list of notes at
8 the bottom of each page (or at the end
9 of the paper if endnotes are being
10 used.) The purpose of footnoting is
11 to allow your reader to check the
12 accuracy of your quotations,
13 citations, and assertions. You should
14 not footnote a major fact that is well
15 known and unchallenged, such as,
16 'President Lincoln was assassinated by
17 John Wilkes Booth' or 'the Normans
18 invaded England in 1066.' Nor is it
19 necessary to footnote most of these
20 'smaller' facts about the events or
21 details in a person's life that the
22 reader can easily check by consulting
23 some of the works in your
24 bibliography. But when such a fact is
25 being emphasized or used as evidence,

1 and certainly when it is in dispute,
2 it needs to be footnoted. Also use a
3 footnote when mentioning another work,
4 primary or secondary, in your text,
5 even if you do not quote it from it
6 directly."

7 Did I read that correctly?

8 A Yes.

9 Q Okay. Would you generally agree with that
10 citation practice?

11 A Generally.

12 Q Okay. Do you have any reservations about
13 that footnote practice?

14 A Well, I did get critiques from one of my
15 books of over-footnoting, so, yeah, I think it
16 depends partly on your discipline as well as on the
17 information itself.

18 Q Okay. Which book was criticized for being
19 overly footnoted?

20 A LBJ's 1968.

21 Q Okay.

22 A One of my most recent ones.

23 Q Okay. And was that criticized by a
24 publisher or by reviewers?

25 A One reviewer and then English professors

1 seemed to -- two ex-English professors.

2 Q Probably not a lot of lawyers, though?

3 A No.

4 Q Okay.

5 A But it was for over-footnoting.

6 Q Okay. Interesting.

7 A But, again, that was a project worked on
8 for four years, a different beast than what we were
9 able to work with here.

10 Q Yeah. Let's talk about that for a bit.

11 So you said that you began work in
12 July 2024. Your first report went in December, so
13 approximately five months, right?

14 Given the scale of the assignment that you
15 were given, how long would you have preferred to
16 have to prepare your report, realistically knowing
17 this is litigation and it is on a timeline?

18 A That's a good question. If this was a
19 standard book, for example -- article versus a book.
20 Article probably 18 months; a book, probably three
21 to four years.

22 Q Okay.

23 A Again, that's one of the things that were
24 sort of odd which I responded to the responses is
25 that --

1 Q Yeah.

2 A -- and -- I'll wait if you have got a
3 question.

4 Q I believe you mentioned that in your third
5 report, the March 17th report.

6 A Yeah.

7 Q And we can get to that.

8 I just wanted to ask. So generally when
9 you're engaging in a research project, do you have
10 deadlines that you have to meet for publishers or
11 other works?

12 A They are very loose.

13 Q Okay.

14 A Yes, if it is an article, you know, you
15 tell the journal editor you would like to get it in
16 by this certain time, but they also realize life
17 gets in the way, sick children, you know, health
18 issues. So they understand. So, you know, if you
19 get a book in on time, for example, most of the
20 editors almost fall over versus 12 to 24 months
21 afterwards --

22 Q Okay.

23 A -- which is more of a norm. Again, you
24 can't control a lot of different issues.

25 Q Okay. Going back to your other litigation,

1 declarations and testimony, we talked about how
2 those were operating on a much shorter, much more
3 compressed time frame, sometimes as little as six
4 weeks?

5 A Yes.

6 Q How does your citation practice in your
7 Camp Lejeune report compare to your citation
8 practice in those reports or declarations?

9 A I tried to follow it as closely as
10 possible.

11 Q So roughly the same number of footnotes and
12 citations?

13 A Right. For a journal article of 30 pages,
14 probably 75, which would be closer to this, than a
15 book where there's hundreds and hundreds of
16 footnotes and -- I won't even say, nobody uses
17 footnotes anymore. It is always endnotes.

18 Q Right.

19 A So as closely as possible within the
20 context of the parameters.

21 Also, I should -- and I think I note this
22 in the third report, my deadline was moved from late
23 January to December 7th. I can't remember why, but
24 that changed some of the dynamics also.

25 Q You were initially told that your report

1 would be due in January?

2 A Yes.

3 Q Interesting.

4 Do you remember when about you were
5 informed that your report would be due in December?

6 A They gave me still, six to eight weeks
7 advance notice, but the original was we are looking
8 at these -- and I know those dates change as a
9 result of court filings and things of that order.
10 But it was a more compressed time frame than what I
11 anticipated originally. And I also was doing this
12 on my own without any assistance, outside
13 assistance, in a comparative sense.

14 Q I understand.

15 A There was no research assistants employed
16 or anything like that.

17 Q At any point did you think about requesting
18 to narrow the scope of your reports so that you
19 could have more thorough discussions or citations to
20 a more limited number of topics?

21 A No.

22 Q Okay. Why not?

23 A I think I had in mind what I wanted to
24 include in the main report, and the discussion of --
25 related to the research question.

1 Q Okay. And when did you first form that --
2 like an oral notion?

3 A It is a good question. I can't answer.

4 Q Was it early or late in the --

5 A Late. I think one of the things a good
6 historian will do is examine the materials first
7 before they make a -- you know, start their general
8 conclusions. Political scientists go the other way
9 around and start with a premise and then try to
10 build their research around it, either prove it or
11 disprove it.

12 As a historian, you tend to do the research
13 first and let that direct your story.

14 Q Okay.

15 A Once you have a research question.

16 Q Understood.

17 So I would like to go back to your December
18 9th report -- sorry, December 7th report.

19 A Okay.

20 Q Exhibit 3. Could you go to page 11.

21 A Okay.

22 Q So subparagraph B, for instance, is the
23 "All-Encompassing Nature of the Base." There's an
24 introductory paragraph. It talks about a large
25 number of civilian workers.

1 Then turning the page, the next paragraph
2 talks about how Marine Corps provided security to
3 protect the base from occupants and crimes.

4 The third paragraph talks about Marines'
5 desire to keep Marines on part of base, prevent
6 clashes between the rowdy Marines and the locals.

7 The fourth paragraph then talks about --
8 sorry, that's the fourth paragraph.

9 But my point is that there's four
10 paragraphs here and there's a single citation to
11 recording in the Leatherneck. Is that correct?

12 A That is correct.

13 Q So how would a reader, whether it be
14 another historian or a judge, know which of these
15 four paragraphs this one citation is supporting?

16 A Part of it is general knowledge, but -- I'm
17 sorry, let me get back over there.

18 I guess that would be the question on
19 general knowledge. And I think what I was trying to
20 do with this, and had I probably been given more
21 time would have what we call pad the bibliography
22 where you fill in these gaps and put in footnotes
23 that would be broad, general ones. But, yeah, so if
24 you see the one that I ended up footnoting was the
25 one with the quotations.

1 Q Okay.

2 A Yeah. But I guess working on the premise
3 there, it could have been possibly more footnotes
4 had I had the time to go back and, again, pad the
5 bibliography.

6 Q Okay.

7 A Because I work on the basic premise. A lot
8 of it is general knowledge.

9 Q I had some questions of what you consider
10 general knowledge. Some of these are very detailed
11 things about, you know, for instance the U.S.
12 military directing bases such as the Marines to
13 remain on the base and funnel funds back into the
14 military PX, restaurants, cultural institutes,
15 things like that.

16 Is it your position that that's general
17 knowledge?

18 A I think it is among military historians.

19 Q Would that be general knowledge to, say, a
20 court or an attorney?

21 A That, I don't know. Again, I think we are
22 working on a premise here. Again, as a trained
23 military historian, if I took this -- I was in
24 Mobile last week at the Society for Military
25 History -- and I took it to the 500 people there,

1 they would have said this is general knowledge.

2 Q Right.

3 A But to take it to a court, no. So could I
4 go back and fill this in and give you the citations
5 from the pages of the general studies? Absolutely.

6 Q Okay. Would you be willing to supplement
7 your report with those sources?

8 A Absolutely.

9 Q Okay.

10 A I don't have any problem -- if that's what
11 is needed, more than happy to do that.

12 Q Okay.

13 A Again, I think, you know, thinking of these
14 in terms of -- your question is very well put, in
15 terms of who is the target audience.

16 Q Right. So I mean you would then agree for
17 purposes of informing a court, the citations here
18 and the assumption of general knowledge, would be
19 insufficient?

20 A For that group, possibly.

21 Q Okay.

22 A Again, I don't want to insult the
23 intelligence of the Court also.

24 Q Of course.

25 A But that would be easily accessed.

1 Q Do you know if all of the assertions in
2 here are supported purely out of the materials that
3 you produced in your reliance list or some of these
4 additional background that you already had prior to
5 working on this litigation?

6 A That's a hard question to answer about
7 what's, you know, accumulated knowledge and what's
8 memory versus what was read in preparation for this,
9 and I can't answer that.

10 Q I understand you have an extensive history
11 that you've accumulated.

12 A Yeah. And what I would note is, if I
13 could --

14 Q Of course.

15 A -- given more time, given, you know -- when
16 you write a book, for example, you go through a
17 whole editing process, and if my editor came back
18 and said we need this, this, this, and this, I would
19 respond accordingly because the editor is the
20 professional. And it goes through multiple levels
21 of review, including external experts that are
22 military historians for this topic, that would know
23 the information. They might come at me and say, no,
24 I don't feel like that is necessary. An editor
25 might have a different opinion, and you adjust

1 accordingly.

2 So that's part of the process that you
3 can't necessarily get in something like this where
4 you have got multiple editor -- professional
5 editors, multiple external reviewers, just -- time
6 or -- you know, it is just not set up for that.

7 Q Okay. Did anyone review your report while
8 it was in draft format?

9 A Yes.

10 Q Okay. Who reviewed your draft report?

11 A John did. You know, but it was not for
12 content. It was more just for did I miss a period,
13 did I miss a -- you know, you know, did something
14 not make sense.

15 Q Okay.

16 A So it was more editing along the lines of
17 editorial advice, not content advice.

18 MR. HUGHES: And I'll let him answer. But
19 I think under Rule 26 notes that aren't relied on
20 and drafts of reports aren't discoverable.

21 MR. GIBBONS: Correct. Did anybody else
22 review drafts of your report?

23 THE WITNESS: No, not to my -- I don't
24 remember anybody else.

25 ///

1 BY MR. GIBBONS:

2 Q Okay. Do you know if Mike Partain ever
3 reviewed a draft of your report?

4 A He looked at essential sections, but, you
5 know, not the whole draft.

6 Q What about Jerry Ensminger?

7 A He may have, I don't remember. I don't
8 think Jerry feels as comfortable in that role.

9 Q Okay. When you said that Michael Partain
10 reviewed sections of it, that was sections of the
11 report before it was finalized?

12 A Yes.

13 Q Okay. Do you know how often you sent
14 sections to Michael Partain?

15 A It couldn't have been more than once.

16 Q Okay.

17 A I mean, again, I don't remember. I think,
18 what I would say is -- I keep going back, you know,
19 these are structural. These aren't the substance of
20 the arguments.

21 Q Okay.

22 A And I think that's important to note. Had
23 I had time -- was I taking this and giving it to the
24 American Historical Review for publication, there
25 would have been a longer opportunity and also sort

1 of different rules knowing what the target audience
2 was.

3 Q Okay.

4 A It is like -- I'll put it this way, it is
5 like writing an opinion piece for the Washington
6 Post or Time or the places -- they don't ever
7 require notes.

8 Q Right.

9 A It is a different audience. They have
10 different expectations.

11 Q But is the methodology that you use to
12 reach those conclusions the same?

13 A The same. The research is. Should they
14 come back and say could we have a footnote on that,
15 I would have that footnote.

16 Q Okay.

17 A The same goes here.

18 Q Okay.

19 A If you really want to know where I got
20 it -- and, again, we didn't also include all the --
21 if I'm not mistaken, on the reliance list, but those
22 reliance lists were relied heavily on. Not every
23 one of them, I don't believe, made it into the
24 footnotes, but I won't swear to that.

25 Q Okay.

1 A But, again, if that's the question, that's
2 easy to address.

3 Q Understood.

4 A But I would go back and say there was one
5 thing I would point out, Dr. Kelman, for example,
6 critiquing common knowledge about what life was like
7 on -- in terms of physical training and things like
8 that, a military historian would have no doubt that
9 that is common knowledge. You as a former officer
10 would have no doubt, that is just common knowledge.
11 But, again, I don't think he had an expertise in
12 military history or 20th Century history to be able
13 to understand. I wouldn't go back and critique him
14 on some of his 19th century choices.

15 Q That's fair enough.

16 A Yeah.

17 Q But would you be able to analyze his
18 historical methodologies for how he arrived at his
19 conclusions?

20 A I would to a point. For example, I would
21 question him wholeheartedly on how he determined how
22 I evaluated my oral history and bias and things like
23 that. Much like I would not question him on that, I
24 would trust him as a professional that he had
25 already made those decisions, and given the long

1 track record I have in that area, I would think he
2 would respect that.

3 Again, as I noted in Report 3, nobody has
4 ever came back and questioned my oral histories.

5 Q Would you say that the sources you relied
6 on, then, were biased in some way?

7 A All sources are biased.

8 Q Okay.

9 A Everything has been used and any -- whether
10 it is Dr. Kelman's work or wherever it may be, you
11 always have to try to ascertain what the bias is.
12 You have to understand the context of something --
13 for example, Dr. Kelman has never interviewed
14 someone that actually was alive for the event. He
15 interviewed people about their memory of the event.
16 He didn't interview anyone from the massacre in 1864
17 for the obvious reasons. So that's a different
18 beast than interviewing somebody about memory.

19 Q Interesting.

20 Did you address the potential biases
21 anywhere in your report?

22 A No. You do that in the -- when you are
23 evaluating the sources themselves. For example, a
24 government report depends on who is writing the
25 report. Is the Marine Corps writing the report? Is

1 the EPA writing the report? You try to do that to
2 the best of your ability throughout the process of
3 evaluating your research. And I think that's
4 something that I, you know -- again, anything can
5 have a bias. And, again, you got to contextualize
6 it. You can't put a document that is from the 1960s
7 and then try to use the current context to say that
8 1960s document within -- what is going on in 2025.
9 You wouldn't want to do that with DADT. "Don't Ask,
10 Don't Tell." It is a very different discussion in
11 the 1990s than it is in 2025, although it has almost
12 come full circle.

13 Q So I understand your point. My question is
14 did you describe that process anywhere in your
15 report?

16 A No. You don't do that. That's not
17 what's -- a description in a book or things of that
18 order. As a professional historian, it is
19 understood that you are going to be testing your
20 materials, much like I would not question
21 Dr. Kelman's oral history for his book on Sand Creek
22 the oral histories he did with National Park Service
23 because I know he understands that the National Park
24 system person that he interviewed extensively has a
25 bias because she is running the monument. And she

1 is also afraid of what could be interpreted, and so,
2 like with anything, you understand people a lot of
3 times what they say isn't always exactly what
4 they -- they always have that context in mind.

5 Q Okay.

6 MR. HUGHES: I'm going to ask that we go
7 off the record for a bit and talk. I've gotten some
8 texts from co-counsel, and I need to talk to y'all
9 about it off the record. Is that okay?

10 MS. HURT: Sure.

11 MR. GIBBONS: Yeah, can we wait just like
12 five minutes or is this urgent?

13 MR. HUGHES: They have a concern about
14 people that are showing up on the -- on the
15 attendance and they are highly concerned that this
16 reading of assistance, being on without advance
17 permission is not what leadership agreed to. So I
18 need to get you on the phone with them as soon as we
19 can.

20 MR. GIBBONS: Okay. All right. Let's take
21 a break. Give me one second.

22 VIDEO OPERATOR KELLEY: This is the end of
23 Media File Number 2. We are now going off the
24 record. The time is 11:21 a.m.

25 (Recess taken.)

1 VIDEO OPERATOR KELLEY: This is the
2 beginning of Media File Number 3. We are now going
3 on the record. The time is 11:36 a.m.

4 MR. HUGHES: This is John Hughes for the
5 plaintiffs. I'm putting on the record that from the
6 plaintiffs' point of view, the language in the
7 deposition protocol about attendance and the
8 language about assistance or people assisting the
9 litigation does not mean that automatically parties
10 can have experts attend depositions without advance
11 approval. We are fine with continuing this
12 deposition today with Dr. Brigham or people on his
13 team on the attendance. We ask that before the next
14 deposition of an expert that the lead counsel talk
15 to each other and see if they can work out a
16 protocol for that.

17 What we suggest is that the protocol would
18 be that if either side wants to have experts on
19 depositions of other experts, that they give advance
20 notice so there's notice and consent.

21 And so that is my statement for the record.
22 And I understand that Mr. Gibbons' position is that
23 the plaintiffs themselves have had experts on one or
24 more occasions without advance consent and so he is
25 not willing to agree to a protocol right now, but

1 I'm hopeful that the folks on DOJ side can agree to
2 a protocol with the folks on our side before the
3 next deposition.

4 MR. GIBBONS: Thank you, Counsel.

5 For the record, I would like to register
6 the language in question in Case Management Order 3
7 comes from paragraph 9, Attendance, which states:

8 "Unless otherwise agreed to by
9 the parties, deposition may be
10 attended only by the parties, the
11 parties' counsel, the deponent, the
12 deponent's attorney, if one exists, in
13 addition to other counsel, plaintiffs'
14 lead and co-lead counsel, or their
15 designee, court reporters,
16 videographers, interpreters,
17 translators, assistants invited by
18 counsel to assist, and any person who
19 is assisting in the litigation."

20 The United States currently interprets this
21 to include expert witnesses that are retained by
22 each of the parties. In past practices we have not
23 had to provide advance notice or agreement for
24 opposing experts to attend expert depositions.

25 The United States would note that Morris

1 Maslia, a retained expert of the plaintiffs,
2 attended the expert depositions of Remy Hennet and
3 Alex Spiliotopoulos with no prior coordination, and
4 the United States did not object then. The United
5 States maintains that any person who is assisting in
6 litigation includes experts attending all other
7 expert depositions.

8 MR. HUGHES: Okay. Thanks for letting me
9 speak, and I understand what you said.

10 You want to continue with your questioning?

11 MR. GIBBONS: Sure.

12 BY MR. GIBBONS:

13 Q Dr. Longley, I apologize for that. I
14 believe we were talking about bias and sources, oral
15 histories, or other materials. I would like to go
16 back to that.

17 I believe you said that your position is
18 that a professional historian does not need to
19 explain in detail how they evaluated their sources
20 for bias because it is an inherent part of a
21 historian's practice. Is that correct?

22 A That is correct.

23 Q And as we've already discussed, the
24 targeted readers for this report are not generally
25 other historians but primarily the Court.

1 Would you agree?

2 A I would agree.

3 Q Well, if the primary reader is a court or
4 other attorneys, they are not trained historians,
5 correct?

6 A Typically not.

7 Q Okay. And even if they are assisted by
8 professional historians in their practice, an
9 attorney or a judge would not necessarily know that
10 trained historians interrogate their sources for
11 bias. Is that correct?

12 A I'm not sure on that. I think most people
13 would recognize that. And, again, given many
14 lawyers are former history majors, I would hope they
15 learned that in their studies. Same with political
16 scientists, which are probably the biggest majority.
17 So I didn't see that in Dr. Brigham's either where
18 he is explaining his sources to them. And, again,
19 as someone with a Ph.D. in history, I respect
20 that -- I didn't go into that because I respected
21 that he knew the historical methodology, but I don't
22 see that in his report either.

23 Q Did Dr. Brigham's report rely on any oral
24 history of individuals?

25 A No, but he did rely on government sources,

1 any of the sources should be, you know, challenged
2 in terms of looking for bias, looking for context,
3 looking for all these different things that might
4 affect their -- a government source on a topic like
5 this might have a bias, depending on when they are
6 writing, what they are trying to protect, are they a
7 public relations officer versus an officer who has
8 been affected. There's a lot of different things
9 that I think, and we test that. And, again, if
10 that's not clear, then any book that's been picked
11 up by a historian you are not going to see that in a
12 written form. So I don't think that's an
13 expectation, even within the context here.

14 Q Okay. Well, let me ask it this way, then.
15 So if you are using various sources, then wouldn't
16 it be important to acknowledge what positionality is
17 of those sources to the material they are being
18 asked about?

19 A Right.

20 Q Okay.

21 A And I think that is made in people like
22 Jerry Ensminger and others to make the point they
23 have been plaintiffs, they have been advocates,
24 especially in the second report.

25 We did -- I did an extensive explanation of

1 the website, its development, how far back they go
2 in these, and so I think maybe I'm wrong. Maybe I'm
3 assuming, which we know sometimes is the wrong thing
4 to do, but that if they are a plaintiff, I have
5 tested for that bias. I acknowledge that bias. But
6 that doesn't necessarily mean that the person's
7 perspective is fundamentally not right or not their
8 truth.

9 Q Well, what you just said makes a lot of
10 sense, but was that explained anywhere in your
11 report?

12 A I didn't go into that detail because,
13 again, in any form of writing that I have ever done,
14 whether it is a book, whether it is an article, and
15 not only -- or my op-eds for the post or the time or
16 wherever you went, that is not something that is
17 accepted as a common practice. And, again, I didn't
18 see it in the expert report from Dr. Brigham either
19 in terms of him explaining his sources. And I guess
20 neither one of us -- we sort of work on a premise
21 that that is an accepted practice.

22 Q So do you disagree with Dr. Kelman's
23 assessment that it is important for historians to
24 show their sources and that they have -- show their
25 work, essentially, that they have exhausted their

1 sources for interrogation for biases and then
2 explain the potential biases in those sources?

3 A He doesn't -- well, I would just say in
4 response I've read Dr. Kelman's work. He doesn't do
5 that either. He hasn't explained it in his
6 narratives. We work on the premise, again, accepted
7 premise among historians, and also even to the
8 general public, that that is what we are doing
9 anyway. That's what makes us professionals. And so
10 I've read both his book -- I've never seen him
11 explain his oral histories, and -- like the person
12 who was the head of the parks, he didn't highlight
13 her biases.

14 Q Uh-huh.

15 A He didn't need to. I think an intelligent,
16 informed person would already test those premises
17 anyway and would ask those questions.

18 So if we need to further explain that,
19 that's easy to do, to say that we did this. And if
20 we need to go back and do that, I'm more than happy
21 to do so, but I would expect them to do the same and
22 I would expect Dr. Kelman to be able to do it in his
23 books. Maybe he calls up -- I think Princeton was
24 the second one's publisher and says, "I need to go
25 back and explain these things." Because, I mean,

1 for example, he accuses us of a couple of things
2 that he himself does. For example, he says, "Well,
3 you only took notes on one of the oral histories
4 rather than recording it and depositing it." I went
5 into his books and read his footnotes, he's got that
6 too. He is throwing --

7 I'll give you another one. On page 3 of
8 the AHA standards, it says:

9 "...accurate citation even more
10 vital. This is why scholarly
11 apparatus in the form of
12 bibliographies and annotations (and
13 associated institutional repositories
14 like libraries, archives, and museums)
15 is essential to the potential practice
16 of history."

17 One of his books does not have a
18 bibliography. In fact, it made it very difficult to
19 go through and determine what his sources were
20 because there was an absence of a bibliography,
21 which is not a common practice.

22 So, I mean, you know, if we want to be held
23 to the same standards, let's apply them across the
24 board.

25 Q Okay. What book was that?

1 A I think it was the one on Sand Creek.

2 Q The Displaced Massacre?

3 A Yes, the Displaced Massacre. There is no
4 bibliography. I could be mistaken. It may have
5 been the one on New Orleans. No. The one on New
6 Orleans had the bibliography because I could track
7 the court cases that he utilized as far as his
8 sources, 25 different court cases.

9 So, again, another thing that was a
10 critique, but turns around and does it himself.

11 Q Okay. Just to be clear, though, your
12 position is that a professional historian does not
13 have to overtly explain the biases and how they
14 evaluated their sources in light of those biases
15 when making their conclusions?

16 A That is done in the process.

17 Q Okay. Dr. Kelman [sic], can you in your
18 own words explain what oral history is?

19 A It is a form of interview which
20 professional historians utilize often. Now, many of
21 us can't because all the subjects are dead. But
22 when you can interview people who were there,
23 involved, you try to do so because it gives a human
24 side to the story.

25 How could I write a book on Vietnam where

1 all I relied on was government sources. How could I
2 write about the combat soldiers' experiences without
3 oral histories, memoirs, letters maybe they wrote
4 home. There's a multitude of things that you can
5 employ. And in certain topics it's much easier.

6 Again, Dr. Kelman couldn't do the
7 Sand Creek massacre because they are all gone. For
8 the most part Mr. -- Dr. Brigham's only book that he
9 wrote on rural electrification, that was in the '20s
10 and '30s most of the people who would have been
11 affected.

12 (Reporter clarification.)

13 THE WITNESS: So he wrote on that, but he
14 wasn't going to be able to do oral history. So the
15 fact that they are critiquing these kind of things
16 when they haven't employed them themselves in terms
17 of the same kind of oral histories is a bit
18 perplexing, I'll just put it that way.

19 BY MR. GIBBONS:

20 Q Okay.

21 A But if you need further explanation --

22 Q Yes.

23 A -- again, it is taking down a written
24 memory of the event. And I stress the point memory.
25 Because you have to test and hypothesize too on what

1 their biases are, what their -- how their memories
2 may be flawed, how they might be self-censoring and
3 time from event, which is part of the process.

4 Again, I don't explain that in great detail
5 because, again, that's almost an accepted practice.

6 Q Okay. Let's talk about that for a little
7 bit more.

8 A Uh-huh.

9 Q When you have conducted oral histories,
10 walk me through your general practice of how you
11 conduct an oral history.

12 A Yeah. It depends. For example, when I
13 interview someone like Al Gore, which I've done
14 several times. He wrote a forward to my book on his
15 father. Al Gore knew, just like what we have done
16 here, if he wanted to stop and go off the record, he
17 would take your tape recorder away from you and that
18 was a sign, "Stop. I will discuss something off the
19 record."

20 Now, that is very different from
21 interviewing someone that is maybe not experienced
22 in giving an interview, and that's sometimes one of
23 the things you learn to do is you take notes because
24 shoving a recorder in front of somebody and they are
25 not experienced with it, they are very suspicious of

1 that, and they might not be as likely to talk to
2 you, you know, as fully as they might if you do it
3 handwritten notes.

4 So there's multiple ways to do this.
5 Typically, though, my goal is always to have them
6 recorded as we did -- we provided -- I take this we
7 did provide that oral history of Mike and Jerry.

8 MR. HUGHES: Yes. We sent a link to the
9 electronic video/audio.

10 THE WITNESS: Yeah, and that would be the
11 traditional way to do it. And it is easier actually
12 now with Zoom because it records automatically for
13 you. And, in fact, it can write notes for you as
14 you are going through it. So that's optimal. The
15 optimal would be to get that. Then have that
16 transcribed. Then have that put in a repository
17 like Mr. Partain's site. Or hopefully in the long
18 run because of, you know, opportunities that do more
19 of this, we could create a central repository for
20 people who are at Camp Lejeune to discuss their life
21 at Camp Lejuene, which I would be -- I would like to
22 do. More, I just didn't have time to do more. But
23 that's the traditional setup.

24 Again, timing made it a little more
25 difficult. For example, I did sort of deviate from

1 a traditional form with Allan Howard because I had
2 already read his deposition, which, to me, is a form
3 of oral history that is accepted as -- in court
4 documents. And it is a form of oral history.
5 Actually, it is better because it is under oath.
6 And that actually makes it even, I think, stronger
7 in terms.

8 So the oral history that was done with
9 Mr. Howard, again, because time was running out, was
10 a very short, abbreviated, just taking -- verify
11 some of the notes and some of his stories. And also
12 I discovered things like he originally said he
13 didn't participate in athletics. Well, comes to
14 find out he was training for a half marathon.
15 That's athletics and that affected some of the
16 outcomes.

17 So I think that, you know -- there's
18 multiple ways to do this, and I think people who
19 would say an oral history -- for example, if you are
20 doing Native American history or history traditions
21 are different than, how do you take folklore and tie
22 it in. So there's complexities to this that are not
23 presented by Dr. Kelman or Dr. Brigham in terms of
24 the critiques of understanding -- and, again,
25 understanding they haven't done it, outside of

1 Dr. Kelman, with people who are just remembering it.
2 Again, if he could pull off finding a survivor of
3 Sand Creek, that would be a miracle since that was
4 1864.

5 BY MR. GIBBONS:

6 Q Right. So I just want to -- we will come
7 back to everything else. I just want to make sure.

8 So your understanding of Dr. Kelman's book
9 is that it is an oral -- purported oral history of
10 the massacre itself?

11 A No.

12 Q Okay. What is your --

13 A It is an oral history of the memory of the
14 massacre itself.

15 Q Okay.

16 A He did not interview anyone that
17 participated in the massacre or -- any form of
18 participation. The closest he got was court
19 documents and memories from people.

20 Q Okay.

21 A But he himself has not conducted an oral
22 history of a particular event of a living person who
23 participated in that event. And there is a distinct
24 difference there.

25 Q Right. I understand your point. But you

1 still believe that the point of Dr. Kelman's book is
2 you focus on the massacre itself. Is that correct?

3 A No, it's -- my reading of it, and I've read
4 it from front to back, because it is a very good
5 book. I will not critique Dr. Kelman's credentials
6 as a professional historian. I will contradict that
7 he is a 19th century historian commenting on
8 military history in the 20th century as a critique,
9 but I will not critique his -- his work is very good
10 work, but it is more about the memory of the event
11 than it is about the event itself. It is a
12 combination. It flows in. But a lot of -- all the
13 oral histories have to do with the memory of the
14 event, not the event itself.

15 Q So if the point of the book was to elicit
16 oral histories about how the event was memorialized
17 rather than trying to get at the memories of the
18 event itself.

19 A Yes.

20 Q Do you understand the distinction? Would
21 that still be an appropriate use of oral history?

22 A Absolutely.

23 Q Okay.

24 A I don't question that.

25 Q Okay.

1 A If you go and look at a number of my books,
2 a lot of times it is about memory.

3 I talk about this in my Morenci Marines. I
4 talk about this in Grunts, and I talk about this in
5 the new book The Forever Soldiers. Memory is an
6 extremely important part of that, but it is
7 different and it has to be critiqued in a different
8 manner also in terms of how you are doing bias.

9 Senator Nighthorse, a member of the tribe
10 itself, if I'm not mistaken, that was affected. He
11 is going to have a bias, which, again, Dr. Kelman
12 doesn't state outright, but I know that he is -- he
13 understands that. And I give him credit for that,
14 again, as a professional historian. Again, it is
15 just a different form of oral history. Just like I
16 mentioned the others that I just mentioned, there's
17 multiple ways to do it. There's also multiple ways
18 that it can be utilized.

19 Q Okay. Interesting.

20 A Just like court documents --

21 Q Uh-huh.

22 A -- from the trial over Sand Creek or the
23 government documents. But, again, context matters
24 and, you know, people are going to want to write it
25 a certain way. Chivington, the perpetrator of the

1 massacre, a Methodist minister, much to the great
2 chagrin of the Methodist Church, is going to have a
3 particular memory of that massacre as opposed to
4 someone that was a person whose family was
5 slaughtered at Sand Creek.

6 So we do that. And that's just part of the
7 historical method.

8 Q Okay. I want to go back to something you
9 said a little bit before we went off the tangent
10 about the misplaced massacre and Dr. Kelman. So
11 your position is that oral history is a broad subset
12 of history that includes multiple different means
13 and mechanisms -- correct? -- including both what I
14 would call, you know, recorded interviews or, you
15 know, full-blown oral histories --

16 A Uh-huh.

17 Q -- but also unrecorded interviews or notes.

18 A Which Dr. Kelman uses too.

19 Q Okay. Interesting. And even depositions
20 then --

21 A Yes.

22 Q -- would be oral history?

23 A Again, I think it is actually a fairly
24 effective form of oral history because you are under
25 oath. Does it still have some of the same issues

1 that we talked about in terms -- again, all
2 documents, all materials that you utilize in these
3 have things that you have to test. Again, if the
4 government is writing something, you always have to
5 be questioning that. If -- again, a survivor of a
6 massacre, of course you are going to test that.

7 Q Right.

8 A And you are working that in your head as
9 you are working through the materials.

10 Q Would you agree that the power dynamic in a
11 deposition is different than in a more traditional
12 oral history?

13 A I think it is infinitely more intimidating,
14 speaking from experience, as opposed to an oral
15 history. But even there, there's a power dynamic.
16 I as -- my favorite book is called the Morenci
17 Marines that I've written and Morenci, Arizona, is a
18 very small mining town in southeastern Arizona, and
19 it is a place where there's not a lot of Ph.D.s that
20 roll into town and start asking a lot of questions.
21 So the power dynamic is my education provides me a
22 position in terms of how these people see me as an
23 educator, as someone with an advanced degree, which
24 can be oftentimes intimidating, and I try to always
25 offset that.

1 When I do these kind of interviews I don't
2 remind them throughout, "Hey, I'm Dr. Longley." I
3 show up, and I'm new in a small town. For example,
4 I wore my cowboy boots and my western shirts and
5 jeans. I didn't show up in a suit. That would have
6 been a power dynamic that it would seem like I was
7 imposing, which then would have led to a barrier to
8 them telling me their stories.

9 So I think in any kind of setting there's
10 always a power dynamic, which I understand and I try
11 to, you know, put into -- and when I test my
12 hypotheses and I test my sources, I try to keep that
13 in mind.

14 Q So I want to focus on that for a minute.
15 So when you said that you conducted these
16 interviews, you know, you wear your cowboy boots and
17 jeans, western shirts and everything, why did you do
18 that exactly?

19 A Because I was raised in West Texas in an
20 oil town.

21 Q Right.

22 A This is a copper mining town. This was
23 something that I understood, one, outsiders are not
24 appreciated. You're always suspicious of them.
25 Reporters are always -- they are always suspicious

1 of reporters. Again, if they don't know you, you
2 are not part of the family, they are suspicious. So
3 I tried to break down some barriers. I joke that
4 the only thing I did wrong was I didn't show up in a
5 Ford or a Chevy pickup, I showed up in a Toyota
6 instead which led to suspicions.

7 So those kind of things -- you are
8 conscious of that when you go. Again, don't go into
9 an interview with a veteran and start saying, well
10 I'm Dr. So and So, things like that. You try to
11 remember -- you try to meet them where they are
12 because you want them to tell your -- as well as
13 they remember it and as well as they can sort of
14 construct it for you.

15 So, I mean, we talked about this in great
16 detail, oral history, but very little of my main
17 report is oral history. It's a very small
18 percentage. So I understand the focus on it, but in
19 the big reality there was so many other things that
20 were taken. Nearly 200 different things in there
21 are reliances.

22 Q Yeah, and I understand that. We are still,
23 unfortunately, relatively early in this deposition.

24 A No, no.

25 Q I just want to get some of these more

1 lingering questions out of way.

2 A Understood.

3 Q It sounds like what you are trying to do
4 is, you said, break down barriers. You are trying
5 to put them more at ease in these interviews. Is
6 that correct?

7 A Yes.

8 Q And why is that?

9 A Because if they have suspicions or if they
10 think that you are out to try to set them up -- for
11 example, in this same story, a lot of the families
12 have been burned by the media in the 1969 when the
13 last person was brought home from Vietnam dead and
14 so they didn't trust media. And that's not
15 abnormal. And the media did sometimes take
16 advantage, tried to play their side of the story.

17 So I think that's the thing you have to try
18 to do is, if you note in the hour and a half that I
19 spent with Jerry and Mike Partain, I probably didn't
20 speak for more than three minutes, four minutes,
21 just to ask questions. Because the goal of the oral
22 history is to have them tell their story. And you
23 want to ask certain questions related to and then
24 always a challenge in oral history is people are
25 going to go off into their own digressions, but out

1 of respect I rarely, unless I'm time constricted,
2 try to pull them back. I want them to be able to
3 tell their story.

4 Q Do you see how that is different than, say
5 the dynamic that we currently are in in this
6 deposition where I am asking questions and you are
7 obligated under oath to answer?

8 A Yes.

9 Q Okay.

10 A I -- again, that's why I differentiated
11 between a deposition and an oral history. The
12 deposition may have more fluidity in some ways
13 because it is under oath. And I recognize that. I
14 don't go in and say, all right, you are to speak the
15 truth, the whole truth, and nothing but the truth.
16 That's not how I approach it, but I do evaluate, do
17 I -- because oral history is not taken in a vacuum.
18 They are taken in the idea you want corroboration.
19 Like oral history of a Vietnam veteran, I would
20 oftentimes go to, like, for example, the Marine
21 Corps archive and check the records were they in
22 Vietnam when they said they were, were they in
23 combat when they said they were?

24 There's ways to corroborate with all
25 sources, just like Dr. Kelman's use of memory.

1 There's ways to corroborate and also see how that
2 maybe it changed over time. But I bet you a
3 million -- well, I don't have a million dollars, but
4 if I had a million dollars I would bet you
5 Dr. Kelman is sitting there going I know Ben
6 Nighthorse is going to say a thing in a particular
7 way. I know that the National Park Service
8 representative is going to say it in a different way
9 because it is a memory. And they all understand the
10 bureaucratic and, again, context.

11 So we do that. Again, I don't think
12 Dr. Kelman or myself, since we used oral history,
13 even though in a different form, have ever been held
14 to a standard you got to outline. This is why I
15 think they were biased. You do that already --

16 Q Yeah.

17 A -- in the corroboration element of oral
18 history.

19 Q I think you just touched on the point that
20 we are confused about because you just referred to a
21 deposition and you differentiated it from an oral
22 history, but then you also said that a deposition is
23 an oral history. So how can they be separate things
24 but also one falls under the other?

25 A I don't think they are separate. I think

1 there's overlap. I don't think they're -- they are
2 not exactly the same because, as you already noted,
3 a power dynamic. Also under oath. But it is a
4 form, in its own way, of oral history that can be
5 evaluated for that. Testimony and a trial, for
6 example, can be evaluated in that way. And, again,
7 that's what a professional historian will try to do.
8 And, again, try to say, all right, was this given at
9 trial? Was this given before? Was this given 20
10 years later? And so I think overlap. I don't think
11 they are mutually exclusive.

12 I know you guys don't use the term oral
13 history, but I don't think they are -- but, again,
14 it is just one of the many sources that we can
15 consult.

16 Q Okay. Apart from, you know, what we will
17 call formal oral history and depositions, are there
18 other things that you would consider oral history?

19 A Well, this is one I just pointed out that
20 my friends in Native American history, issues like
21 folklore, how do you evaluate those, you know, and
22 because a lot of the traditions, and Dr. Kelman
23 would know this book very well, is a book on a Camp
24 Grant massacre called Shadows at Dawn by Karl
25 Jacoby. He had to rely on one group, the Apache,

1 did almost all oral tradition. They didn't have the
2 written, you know. They didn't have paper running
3 around and things like that. One of the other
4 tribes did it through the way they notched poles.
5 So you, you know, there are different things that
6 can come out of that, and then the memories are
7 passed down. So we understand that, and we
8 differentiate. I have never used folklore for --
9 for fear of the challenges and lack of corroboration
10 especially. But for the people doing history in
11 these other ways, for peoples whose stories would be
12 lost without these discussions, I think that's
13 important.

14 Ours, fortunately, we don't have that
15 problem. We have got government documents. We have
16 got newspapers. We have got all these other things
17 in which we can corroborate stories.

18 And these are things we discuss when I
19 teach an oral history class or do an independent
20 study in oral history. I haven't really taught a
21 formal oral history class. I've taught independent
22 studies for people who are going to be involved in
23 projects that we're going to need some basis of oral
24 history.

25 Q That's very helpful, thank you.

1 A It is more about oral history than you ever
2 thought you wanted. The best thing to do is read
3 Dr. Ritchie's book on Doing Oral History.

4 Q I'm glad you brought that up because I
5 wanted to talk about the things you used in your
6 report. I think you talked about the various
7 methodologies that you employed in your report and
8 everything, one of which was doing oral history, the
9 other was --

10 A Which one?

11 Q -- in the Oral History Manual, I think.

12 A Yeah.

13 Q That was in your first report, I believe,
14 correct?

15 A Yes. It is under the Methodologies, Part B
16 of the appendix.

17 Q Hold on a second. Yeah. If you go back to
18 Exhibit 3, I believe, December 7th report, page 47.

19 A Right.

20 Q Last paragraph.

21 A Yeah, The Oral History Manual by Quinlan.

22 Q Uh-huh. Yeah. About midway through the
23 paragraph you wrote:

24 "Building on the methodology
25 outlined in books including Don

1 Ritchie, former historian of the
2 senate, Doing Oral History, A
3 Practical Guide, and Barbara W. Sommer
4 and Mary Kay Quinlan, The Oral History
5 Manual, along with good examples of
6 oral history collections such as Studs
7 Terkel The Good War: An Oral History
8 of World War II or Christian Appy's
9 Patriot, the Vietnam War Remembered
10 From All Sides."

11 Did I read that correctly?

12 A Correctly.

13 Q You are familiar with Dr. Ritchie?

14 A Yes.

15 Q Right? You are a colleague of his? You
16 have met him before?

17 A (Nods head.)

18 Q And obviously you think highly of his book.
19 That's why you cited it, correct?

20 A Yes.

21 (The document referenced below
22 was marked Deposition Exhibit 8 for
23 identification and is appended
24 hereto.)

25 ///

1 BY MR. GIBBONS:

2 Q At this point I'm going to introduce --
3 I'll represent to you that this is a copy of the
4 most recent edition of "Doing Oral History" by
5 Dr. Don Ritchie.

6 A Uh-huh.

7 Q We will go to page -- I believe it is 19.
8 Yeah. So there's no page number for 19, but it
9 comes right after 18 and before 20.

10 A Right.

11 Q So under the heading "What is oral
12 history?" First sentence is:

13 "Memory is the core of oral
14 history from which meaning can be
15 extracted and preserved. Simply put,
16 oral histories collects memories and
17 personal commentaries of historical
18 significance through recorded
19 interviews."

20 Did I read that correctly?

21 A Yes.

22 Q Okay. And that would suggest that oral
23 histories should be recorded in some way, correct?

24 A That would imply when you have the
25 opportunity and you have the resources to do so.

1 Q Okay. And that is opportunities and
2 resources you didn't have for this project?

3 A Not to the same degree.

4 Q Okay.

5 A I didn't have time. And it also was
6 different. Again, I use the deposition and put it
7 alongside a short oral history for -- gosh, I just
8 blanked on -- well, it will come to me in just a
9 moment.

10 But, yeah.

11 MR. HUGHES: Mr. Howard.

12 THE WITNESS: Yes, Mr. Howard.

13 You know, that would have been optimal is
14 to be able to sit down and do an interview with him,
15 record it, and get it transcribed and deposited.

16 BY MR. GIBBONS:

17 Q Okay.

18 A Timing was of the essence. And, again, it
19 was working parallel to a deposition.

20 Q So you do believe it is valid definition of
21 oral history?

22 A If you have the time and resources,
23 absolutely.

24 Q Okay.

25 A I didn't have multiple research assistants,

1 I didn't have -- you know, again, I was doing this
2 on my own under a very tight deadline.

3 Q That makes sense.

4 A Yeah.

5 Q Earlier you said that, you know, you did
6 this via Zoom -- correct?

7 A Uh-huh.

8 Q -- with Mr. Howard.

9 And you talked earlier about how Zoom makes
10 it very easy because you just press the record
11 button and you record, correct?

12 A You can, but I will go back and say when
13 you try to do that, some people are very
14 uncomfortable with that.

15 Q Okay.

16 A If I remember right. And, again, there's a
17 flurry of things in my head. He did not seem
18 comfortable with that. And, again, it was a very
19 short, just sort of tight, tied to the deposition.

20 Q Okay.

21 A And same goes with Jerry. It was on a
22 tight -- I wouldn't have had time or the resources
23 to get it -- the deposition transcribed. And it was
24 a very short -- because a lot of what I was talking
25 with Mr. Ensminger was reinforcing what he'd already

1 told me in other meetings.

2 Q Well, how many meetings did you have with
3 Jerry Ensminger?

4 A For example, I had a meeting with him in
5 terms of -- he was my guide when I went to
6 Camp Lejeune to go around the base.

7 Q Okay. And we'll come back to that, but
8 before I forget, roughly when was that trip to
9 Camp Lejeune?

10 A You can tell by my invoices.

11 Q Okay.

12 A Because I have my invoice fairly detailed
13 in terms of when I was at Camp Lejeune.

14 Q Got you.

15 A I want to say in August, but it could have
16 gone into September.

17 Q Okay. So late summer, early fall?

18 A Yes.

19 Q Okay.

20 A Had I had opportunity, the reason we
21 provided the sample to you of how I would have
22 preferred to have done it had I had the time and
23 also, again, maybe not pushback in terms of
24 suspicions of, you know, this is out there in a Zoom
25 form, which is something else we have to battle

1 right now, even it is easier, a lot of people are,
2 like, I don't want my stuff in the public domain.
3 And that's something -- because if you know also --
4 this was not brought up by Dr. Kelman or
5 Dr. Brigham, the idea is you have to sign a document
6 that frees you to let this go into the public
7 domain. For example, when I was at the Johnson
8 Library as the director we had existing oral
9 histories that would not be released until a certain
10 day after the death of a person or the death of all
11 the family members or the people who were involved.

12 So you can put significant restrictions on
13 oral history so that they can be deposited but they
14 may not ever be seen.

15 Q And the reason for those releases is
16 because, technically, an oral history is a story of
17 the individual being interviewed, correct?

18 A Exactly.

19 Q And, therefore, copyright attaches
20 automatically, correct?

21 A Copyright attaches plus there's sometimes
22 they're a little -- they don't want certain stories
23 out until after they are gone.

24 Q That makes sense.

25 A And that is not an uncommon practice. And

1 that's why we in our oral history did get the
2 release form and -- did we provide that, the release
3 form?

4 MR. HUGHES: We provided a demonstrative
5 release form, which I've also brought copies of.

6 We also -- Mike and Jerry signed an earlier
7 version release form. I don't remember if I
8 provided those or not.

9 MR. GIBBONS: You provided -- I'll
10 represent that you provided the releases for Mike
11 Partain and Jerry Ensminger --

12 MR. HUGHES: Yeah.

13 MR. GIBBONS: -- as well as the
14 demonstrative.

15 MR. HUGHES: Okay. But my note being --
16 and I think I dated the demonstrative to make the
17 point it is a work in progress. So the current
18 demonstrative form has -- is different from the
19 one -- the ones that Mike and Jerry signed because
20 it was edited subsequently after -- it might have
21 been after we -- as we have been deposing Brigham
22 and Kelman and so forth, we have been learning more,
23 so.

24 BY MR. GIBBONS:

25 Q Just to be clear, you did not record your

1 exchanges with Allan Howard, correct?

2 A No.

3 Q Okay.

4 A Again, he was -- if I remember right, he
5 was fairly resistant to that. Again, I understand
6 people nowadays not wanting things floating out
7 there in the -- you know, online because then they
8 could be misrepresented or taken and used in a
9 variety of different ways. So I didn't push that
10 issue. Especially since it wasn't really one where
11 I was trying to deep-dive on Mr. Howard because of
12 his deposition.

13 Q Okay. So but you said the primary thing
14 you discussed with him was his deposition, correct?

15 A Yes.

16 Q Were there any other topics that you
17 discussed with Mr. Howard?

18 A No. Just coming out of deposition, like
19 you say the only thing that was new was that he had
20 participated in athletics in the form of training
21 for a half marathon. That was it. It only went
22 maybe 25 minutes, 30 minutes.

23 Q Do you think there might have been some
24 resistance to having this oral history recorded
25 since he might have elicited information that ran

1 contrary to his recorded deposition?

2 A I don't think he thought about that.

3 Q Okay.

4 A I don't think -- I don't mean this in a
5 negative sense, but I don't think he is that
6 sophisticated. He is not in a group with a bunch of
7 lawyers or Ph.D.s where we all are testing our
8 hypotheses and also, you know, for the obvious
9 reasons. I don't think that that was any kind of
10 question, no more than with Jerry Ensminger that he
11 was trying to put something out there. I mean, you
12 look at the amount of public documents that he has,
13 it is substantial. I just rewatched the --
14 Semper Fi, the documentary, so he is pretty much on
15 the record across the board.

16 Q Okay.

17 A I was mainly asking for him to verify what
18 we had already discussed.

19 Q Okay. But you are talking about Ensminger,
20 now -- correct? -- not Howard?

21 A Yes.

22 Q Okay.

23 A Howard was again mainly just a verification
24 of the deposition materials, which is part of the
25 process of wanting to corroborate, to make sure

1 there isn't a differential.

2 Q Okay.

3 A Which can happen.

4 Q Did you take any notes at the time that you
5 were interviewing Mr. Howard?

6 A Yeah. I thought we made those available.

7 MR. HUGHES: We did. You had --

8 THE WITNESS: I typed them up.

9 MR. HUGHES: It was a page of typed notes
10 that we produced.

11 THE WITNESS: Yeah. I typed them up. A
12 lot of times I do that because then I can sustain a
13 record because handwritten things can get lost.

14 BY MR. GIBBONS:

15 Q Okay. Are you aware that the United States
16 requested those notes immediately after your
17 December 7th report was --

18 A I thought we sent them in the form of the
19 typewritten ones.

20 Q Okay.

21 A If we don't, I'll be happy to provide them.

22 Q Okay. Thank you.

23 Do you understand why it might concern
24 another historian that's trying to retrace the steps
25 that you went through that there were no notes

1 provided initially about the oral history?

2 A I can, and I would say the same to
3 Dr. Kelman, let me see the notes, your handwritten
4 transcribed notes, of the one that you did. Which
5 you did over probably 12 years. If I looked at the
6 start of his research to when he turned in --
7 published the book, over a 12-year period.

8 So I mean if we really want to -- but I
9 think probably I work on the premise that a
10 professional historian is held and understands the
11 standards and will meet those standards, and if I
12 don't have a reason not to think that, then I
13 wouldn't question it.

14 Q Okay. But I believe Dr. Kelman noted in
15 his book that the notes of that conversation you are
16 referencing were on file with the author, meaning
17 Dr. Kelman himself, correct?

18 A And they are on file with me.

19 Q Right, but that was a signal that was put
20 into his book to inform the reader that those notes
21 were available, but that they were not going to be
22 produced in the book itself, correct?

23 A Yes.

24 Q Okay.

25 A And, like I say, in a different environment

1 with more time, probably would have been able to do
2 that.

3 Q Okay.

4 A Allan Howard oral history, again, I
5 probably couldn't locate all of Dr. Kelman's oral
6 histories. Again, Dr. Brigham doesn't have any, so
7 there's nothing to trace.

8 Q Right.

9 A So, you know, if we are going to hold -- if
10 people are going to try to critique a methodology,
11 it would help to actually know the methodology and
12 actually having used it in the same form that they
13 are asking me to use in terms of interviewing people
14 who are alive who lived here during that time.

15 Again, it is a very different beast when
16 you are talking about memory.

17 Q Then going back to Jerry Ensminger now --

18 A Uh-huh.

19 Q -- because I want to talk about that.

20 So you did record the one interview, the
21 joint interview with Jerry Ensminger and Mike
22 Partain, correct?

23 A To show the methodology and given the time
24 and given the resources, I would have been able to
25 do more, and this would be the traditional form I

1 would prefer to follow. But, again, there was
2 context. And that's what I would say is if you went
3 to anybody else that did oral history, you explain
4 to them the deadlines and the timeline, they would
5 be, like, all right. Understood.

6 Q So I guess my question is you didn't record
7 any of the prior interviews with Ensminger or
8 Partain, though, correct?

9 A I did not record.

10 Q Was there a reason --

11 A There was only one with Ensminger.

12 Q Okay.

13 A Yeah.

14 Q What about with Mike Partain?

15 A No.

16 Q There's --

17 A The only thing we had, like I say, he was
18 there when we went -- I went to go to Camp Lejeune
19 and, like you say, I picked up a lot of his stories
20 and things like that, but I didn't use those stories
21 without corroborating them in a different form.

22 Q Mike Partain was with you when you went to
23 Camp Lejeune?

24 A Yes.

25 Q So --

1 A Mike and Jerry --

2 Q Okay.

3 A -- were the two that were my hosts. I
4 originally had someone else lined up, but they
5 didn't necessarily feel comfortable doing it because
6 there is still some politics involved and they were
7 still in the Marine Corps and they were afraid that
8 might, you know, not be the best thing. So we were
9 able to substitute Jerry and Mike, and that was for
10 the better, I think, not to put the other person in
11 harm's way.

12 Q Okay. Did you consider asking the United
13 States to allow you to take a tour of the base with
14 a Marine escort?

15 A I could have. I did that at Quantico. I
16 mean, I did that. I don't think it would have been
17 valuable because I would have had to weigh the whole
18 time what are they showing me and what are they not
19 showing me. You know, I understand that with Jerry
20 and Mike too. They showed me things, they gave me
21 their stories. Did I work hard to corroborate them?
22 Absolutely.

23 Q Okay.

24 A You know, and, again, I understand they are
25 plaintiffs. I understand they have a bias. And I

1 weigh that against the corroborating evidence, which
2 is what you should do with all documents, all
3 materials.

4 Q Okay. And, broadly speaking, what would
5 you consider to be corroborating evidence for what
6 you spoke to with Jerry Ensminger?

7 A The Globe. Command Chronologies. Other
8 stories from different people, you know. He wasn't
9 repeating a unique story.

10 Q Okay.

11 A But, again, The Globe is probably the best
12 source if you want to understand -- if I had to
13 choose one to say, Judge, read this, or Jury read
14 this, read The Globe. Read one from '55, '65, '75,
15 and '85 and you will see some changes over time, but
16 they still focus on the same kind of basic
17 principles. A good local newspaper, just like -- as
18 a historian, if I was writing the history of
19 Roanoke, Virginia. I'll use your home state. And
20 Roanoke, Virginia, I would go back and use some
21 newspapers as one of my main sources because,
22 especially in the 19th century, there might not be
23 other sources to the degree. There's not going to
24 be TV stations. There's not going to be all these
25 things that maybe we could draw on today.

1 So that newspaper alone is a very valuable
2 primary document.

3 Q Okay.

4 A Even though many people will say, well, a
5 newspaper is secondary. In this case, it is a
6 primary document. Which Dr. Brigham used also.

7 Q Obviously, they were in your reliance
8 materials, but estimate how many issues or articles
9 from The Globe did you review during your research?

10 A Thousands.

11 Q Okay.

12 A Because my sons once asked me, they said,
13 "What do you do when you go on a research trip?"

14 I said I sit in that archive, and when I
15 went to Quantico I turned document after document
16 after these were brought out by -- I didn't assign a
17 research assistant to go do it. I went and did it
18 myself, and I turned document after document. Out
19 of a thousand documents, maybe five to 10 actually
20 are valuable, but you still have to do it.

21 Same deposition with The Globe. Don't know
22 how many I read that did not maybe apply to the same
23 degree or I had already had an example and didn't
24 need to beat it to death. Probably if I had had
25 time, I would have padded the bibliography big time

1 with The Globe to say, all right, here is a story on
2 Frank Sinatra, here is a story on whomever it may
3 be, Lou Rawls, which we include, but there were lots
4 of others that we could have included too. But you
5 don't use them time and time again, then it becomes
6 redundant. So probably thousands and to use, a
7 hundred.

8 Q Were all of the copies that you reviewed
9 listed in the reliance materials as materials
10 considered?

11 A No. No. Because if I didn't use them in
12 the footnotes or use them in my narrative, I didn't.

13 Again, maybe if I had six more months, I
14 would have gone back and tried to reinforce some of
15 the things, but they were just -- again, it is
16 redundancy in many ways. So I think that's -- but
17 thousands and thousands of pages. Gosh, to read the
18 whole run, though, good luck with that.

19 Q Right.

20 A You know, that would have taken years and
21 years to do that.

22 Q Okay. Or a large staff?

23 A Or a large staff, which I had no staff.

24 Q Correct.

25 Do you understand the difference between

1 the citations that are in the report itself versus
2 the reliance materials that are provided after the
3 fact?

4 A Yeah. Those are more the form of a
5 bibliography I see. If you were to ask me to
6 explain it in my world, it would be more the
7 footnotes have their place and the reliance list is
8 more like the bibliography. That's how I sort of
9 read it. That may not be how the legal world reads
10 it, but that's how, as a historian, I would read it.

11 Q Going with that analogy, what would you
12 describe the purpose of the footnotes to be, then?

13 A To try to give a reader some basic
14 understanding of where these materials came from.

15 Q Okay. And then the bibliography?

16 A To reinforce that, but maybe incorporate
17 some that maybe were not incorporated into the
18 footnotes.

19 Q Okay. Would you agree that both of those
20 are a fundamental part of allowing other historians
21 or readers to retrace the historian's steps?

22 A Absolutely.

23 Q Okay. Was there a specific reason that you
24 didn't record your oral histories with Jerry
25 Ensminger before the final one?

1 A I don't remember.

2 Q Okay.

3 A You know, like I say, I just -- I think we
4 were running out of time. I was trying to take the
5 notes, just trying -- again, it was a compressed
6 time frame.

7 Q Okay.

8 A And had I -- again, I think we provided a
9 very good example of what I would have done given
10 the time and resources. And I would love to do
11 more. That's the thing I always say. I would love
12 to do a lot more of these to try to give the human
13 face to it. I would be willing to sit down and,
14 given the time and resources, go in with Dr. Brigham
15 and sit down and say, all right, let's develop some
16 questions. Let's go get people, say, from Onslow
17 Beach and let's test our hypotheses and do that
18 together. I have no problem with that, so that we
19 could frame it and let us further create the story
20 because, as the historian what I want to do is just
21 try to get to the heart of the story as much as
22 possible and I think more would be better. And I
23 had 30 to 40 planned but ran out of time.

24 Not to use only depositions, not only to
25 use plaintiffs, but let's use people who were there

1 but maybe are -- so the argument of bias can be
2 reduced. So I'm more than willing to go and do
3 that, and I would say to Dr. Brigham let's do it.

4 Q Well, let's talk about that for a second.
5 So, like, how would you go about identifying
6 nonplaintiff personnel had been at Camp Lejeune
7 during the statutory period?

8 A There are a couple ways you can do this.
9 This is learning from past experience on my work
10 with combat veterans. A lot of these places like
11 Camp Lejeune or units have Facebook pages. They
12 have Instagram posts, and you can post saying, all
13 right, here is sort of what I'm looking for. We
14 want people from mid-'50s, mid-'60s, mid-'70s,
15 mid-'80s, you know. I'm just speculating.

16 Q Right.

17 A We want housewives. We want dependents.
18 We want -- you know, you could think of how to do
19 this in a way where you could create a pretty good
20 sample size.

21 Typically what -- if you read Dr. Ritchie
22 and others, if you can get sample sizes of 100 to
23 150, there is not going to be too much of standard
24 deviation over the stories.

25 So that would be what I would say. There's

1 a lot of ways. When I wanted to find out about the
2 Morenci Marines, I'm like -- I put out a note on one
3 guy's unit, and he came back to me. The medic who
4 had treated him when he died had kept the record and
5 sent it to me.

6 So there's ways to -- we got DOD records.
7 There's ways that we could -- and, again, if you
8 want to say, well, I want to take out the sampling
9 of the plaintiffs -- which I think would be wrong, I
10 think you need to have a little of both, but -- and
11 we test where they lived on base, there's lots of
12 things that we could do in a variety of different
13 ways in which you could really test the hypotheses.

14 Q But the primary reason that you weren't
15 able to do so is because of the time constraints,
16 correct?

17 A Exactly. Like I said, I remember
18 talking -- I don't even remember -- but it was,
19 like, I would like to do 30 or 40 more, just ran out
20 of time.

21 Q Okay.

22 A And I don't have the resources, you know.
23 December 7th should hit many of you, because you
24 guys are very young, you just got out of school, and
25 you know that's finals time. You think that was

1 fun? I ended up in the doctor's office by January
2 because my left shoulder had frozen because I'd
3 spent so much time at the computer. And, again, I'm
4 doing it on my own.

5 So, yeah, finals time, that's always a fun
6 time. You guys are not so far removed. You
7 remember those days, but on the faculty side it is
8 not a pleasant time to be grading all the papers and
9 grading all the finals so, you know. Again, I would
10 have loved to have done more. I would still love to
11 do more. I would love to track down some of these
12 documents that are missing, you know, that are --
13 you know, that I'm finding out about. That's the
14 historian. We are sleuths. We want to chase down
15 anything and everything, and if it contradicts us,
16 God bless it, you know. If you are a good, honest
17 historian, if it is a contradiction, you
18 acknowledge.

19 Like I said, I acknowledge Dr. Brigham's
20 bringing up that there were more cars on campus --
21 or on base because -- you see, I've got campus on
22 the brain -- on base so that I can say, all right,
23 maybe I think about that differently, and that's
24 what they are talking about here. We as a community
25 are creating the information.

1 Q That's interesting.

2 A But, yeah, let's do more.

3 Q Okay.

4 A I'm always ready to have my hypotheses
5 tested. I don't claim to be, you know, omnipotent,
6 but, so let's do it together. Let's work together.
7 He has got a staff. Let's put them to work,
8 although I want a little balance. I don't want his
9 people only to be the only ones involved, but, you
10 know, let's put this -- let's test it because,
11 again, I still for the life of me cannot figure out
12 why they wouldn't want these personal stories, even
13 though -- even though I would say you can test their
14 bias. You can test these things, just like you
15 should test all your materials.

16 Q Do you agree it would be more difficult to
17 identify nonplaintiff members that -- no?

18 A No.

19 Q You believe it would be just as easy to
20 identify individuals who served at Camp Lejeune
21 during the alleged period of contamination that are
22 not plaintiffs?

23 A I think it would be possible. I'm not
24 going to say as easy because we know who the list
25 are.

1 Q Right.

2 A But, again, utilizing these other methods,
3 we could reach people that are not part of the
4 plaintiffs group. Again, I don't think that would
5 be fair. You would want to have a balance, but I
6 think you could reach them, again, through the
7 websites, through -- again, a lot of them do
8 reunions. That's how I found a lot of times
9 veterans. They do their own reunions typically
10 every five years for their unit.

11 We could go and look at the -- they produce
12 a lot of times -- no, that's more or boot camp where
13 they produce a graduation photo just like a high
14 school annual.

15 We could look for the kids, you know. We
16 want children, what they remember, because they
17 remember things sometimes differently than adults.

18 So I just think there's a lot of potential
19 there to really do a very interesting -- again,
20 let's test the hypotheses. I have no problem with
21 that. I'm willing to put the time in and put the
22 effort in now that we have a little more time. To
23 me that's always good.

24 Q What do you mean "Now we have a little more
25 time"?

1 A I mean, you know, I'm not crushed under
2 finals. I'm not spending the whole time writing.
3 You know, I've written -- I think we factored in the
4 other day in the three different reports, I wrote
5 213 pages double spaced.

6 Q Right.

7 A That's a lot of writing over a very short
8 period of time.

9 Q Understandably.

10 A Yeah. Yeah.

11 Q Did you ever discuss this desire to have
12 more oral histories taken with Mike Partain?

13 A Not directly with him, no.

14 Q Okay. What about indirectly?

15 A It was more that he had already performed
16 those, and so I know he had done some of this work
17 with his master's thesis.

18 Q Okay.

19 A His website. But no, it wasn't their idea.

20 Q Okay.

21 A This is my idea of the whole concept of --
22 again, a historian should never be satisfied. They
23 should always still be testing as long as they can.

24 Now, am I going to go back and retest my
25 book I published in 1997? I'm tired. I don't want

1 to deal with something that far back and I don't --
2 and the story hasn't changed. Nobody has challenged
3 me on my first book of the story changing. So why
4 do that. This is more, like I say, when I'm in the
5 middle of a project I want to dive. And I want to
6 find those sources. I want to uncover as much as
7 possible to complete as full a story as possible.

8 Q Got it.

9 MR. GIBBONS: Where are we at on the
10 record?

11 VIDEO OPERATOR KELLEY: Time is two hours,
12 34 minutes.

13 MR. GIBBONS: We have been at this for
14 about an hour since our last break. Do you want to
15 take another break?

16 THE WITNESS: I would like one if I could.

17 VIDEO OPERATOR KELLEY: This is the end of
18 Media Number 3. We are now going off the record.
19 The time is 12:37 p.m.

20 (Recess taken.)

21 VIDEO OPERATOR KELLEY: This is the
22 beginning of Media File Number 4. We are now going
23 on the record. The time is 12:48 p.m.

24 BY MR. GIBBONS:

25 Q Dr. Longley, before we took a break, we

1 were still talking about oral history and
2 interrogating sources, evaluating bias, things of
3 that nature. The historian's craft.

4 I'm going to flip back to oral history,
5 Doing Oral History, which I believe was Exhibit 8.

6 A Yes.

7 Q Okay. Flip to page 24 of the text. All
8 right. The very last paragraph on 24 begins:

9 "An interview becomes an oral
10 history only when it is recorded,
11 processed in some way, and made
12 available in an archive, library, or
13 other repository, or reproduced in a
14 relatively verbatim form for
15 publication. Availability for general
16 research, reinterpretation, and
17 verification defines oral history. By
18 preserving tapes and transcripts of
19 the interviews, oral historians seek
20 to leave as complete, candid, and
21 reliable a record as possible."

22 Did I read that correctly?

23 A Yes.

24 Q But it is your position that an oral
25 history does not need to be recorded or that notes

1 need to be taken, correct?

2 A No, it is that notes need to be taken, not
3 necessarily -- because I would disagree with Don on
4 this. He and I have actually had conversations on
5 this matter. I think that's way too narrow a
6 definition of oral history. I would argue
7 journalists do it on a daily basis. Many of them
8 keep notes, which are then later used as a
9 historical document. I would not argue Robert Caro,
10 the journalist, who has written extensively on LBJ.
11 Pulitzer Prize winner, I would not tell Bob Caro
12 that he is not good at oral history when he is
13 interviewing and he doesn't follow a particular
14 procedure.

15 Again, a Pulitzer Prize winner, that sort
16 of carries a little weight. Is it optimal?
17 Absolutely. Is it required? I would argue no, and
18 there are debates within the field of what
19 constitutes oral history. Again, I feel like this
20 is too narrow.

21 Q Okay. But we have already established that
22 because of modern technology, recording the
23 interview does not take any more time or resources,
24 it is merely a level of comfort of the interviewee.
25 Is that correct?

1 A That is correct.

2 Q Okay. And I want to pivot slightly. So a
3 hypothetical. If, for instance, you did use the
4 definition of Don Ritchie, of Dr. Kelman,
5 Dr. Brigham of oral history, or of Quinlan for oral
6 history, would you still say that all of the
7 interviews and oral histories that you conducted for
8 this expert report, would those qualify as oral
9 history under those definitions?

10 A Not under their definitions, but I would
11 still argue that they qualify as oral histories.

12 Q Okay.

13 A I don't think you can disqualify them just
14 because they didn't follow A, B, C, D, and E. This
15 is their definition, and that's fine. Again, it is
16 an optimal form. But it isn't just oral history.
17 Again, go ask somebody that does Native American
18 history or ask someone who is heavily on oral
19 history in a different form, and you will get a
20 different answer.

21 Q Okay.

22 A So this is not the only definition.

23 Q Okay.

24 A It is one that, again, if it can be
25 followed, God bless. But, again, not everybody can

1 follow the same form.

2 Q Okay.

3 A We are talking out of the ones that I did,
4 two, Howard and Ensminger, but then we followed up,
5 if you read my notes from Ensminger, you will see a
6 lot of those reinforced in the formal one that I do.

7 Q Okay.

8 A And, again, we are only talking a very
9 small portion of my research anyway.

10 Q Right. I understand.

11 A And, again, I understand why they want to
12 slice and dice on this. Again, given the fact that
13 Dr. Brigham didn't even bother to use it, I'd
14 probably appreciate his critique better if he was
15 actually a practitioner that actually was familiar.
16 Kelman, I'll give him more ground.
17 Dr. Brigham, I don't give any ground. My
18 fundamental question still to him is why didn't you.
19 It is a viable research.

20 Q Are you aware of the adversarial nature of
21 our legal system?

22 A Yes, and that's -- I understand. I
23 understand this is more of an argumentative essay
24 rather than an -- you know, our standard form where
25 we are trying to create thesis followed by, you

1 know, a narrative.

2 Q Beyond that, I mean, are you aware that
3 attorneys and their agents are governed by rules of
4 professional conduct?

5 A Yes.

6 Q Are you aware that one such rule precludes
7 attorneys or their agents from speaking with
8 represented parties about matters that are relevant
9 to the litigation?

10 A Okay. Then I would turn that and say,
11 well, go interview people who weren't part of the
12 groups that are involved as litigants.

13 Q Okay.

14 A I think that's -- again, I still don't know
15 why -- you know, if I was going to strengthen my
16 argument, that would be something I would have
17 personally tried to do. It may have proven that I
18 was wrong, but I would have at least tried.

19 Q Okay.

20 A But, again, it didn't have to go after
21 litigants. It could have gone after the hundreds of
22 thousands of others that might have served or been a
23 dependent at Camp Lejeune -- I almost slipped and
24 said Quantico.

25 Q But, as we discussed, the reason that you

1 did not do such things is because you were operating
2 on limited time, correct?

3 A Yes.

4 Q Do you think that limited time also applied
5 to Dr. Brigham and Dr. Kelman?

6 A Dr. Kelman didn't do any research, so I
7 don't -- we know it didn't apply to him. He didn't
8 do any of his own primary research on the topic. He
9 read reports and looked at methodology.

10 Dr. Brigham, I think he had a five- or
11 six-month head start on me and also a large number
12 of researchers on his staff. So I think that's an
13 apples and oranges comparison.

14 Q Fair enough.

15 Does Dr. Brigham ever hold himself out to
16 be an expert on oral histories?

17 A No, he doesn't.

18 Q Okay.

19 A But perhaps if you are going to do subjects
20 like this, you should.

21 Q Do you believe that being an oral historian
22 requires proper training and ethological rigor?

23 A It does in practice over time. So I
24 understand that he hasn't had that. His topic -- he
25 has not been a practicing member of the historical

1 profession per se in the professional sense that
2 Dr. Kelman or myself over the last 30 years.

3 Q You don't believe that Dr. Brigham is a
4 professional historian?

5 A No, he is a professional historian, but he
6 is not a practicing professional historian like
7 Dr. Kelman and myself who go to conferences, who
8 give papers, who continue to direct graduate
9 students and teach undergraduate classes. There's a
10 difference. Practicing is the key word.

11 Q I guess my question is in your definition
12 of practicing historian, you would mean that they
13 must be engaged in academia or writing books or --

14 A They need to be -- they need to be engaged
15 in research -- I'm sorry, I cut him off. I'm sorry.

16 Engaged in research, engaged in presenting
17 their materials, engaged in the community. For
18 example, the Society for Military History, probably
19 25 percent of our membership are not academics, are
20 not working for the government in various forms with
21 Ph.D.s. They are people who are just interested in
22 the topics. So, no.

23 Q I guess I'm trying to understand why you
24 don't consider him a practicing member of history.
25 Practicing member of --

1 A I think the standard is if you were to ask
2 someone what a professional practicing historian
3 would be, when is the last time you went to a
4 conference and presented a paper. When is the last
5 time you wrote a research that was published? When
6 was the last time -- and he did for a short period
7 of time through about '95. When have you been
8 active in the profession? And, again, "the
9 profession" is very broadly defined. It is not just
10 academics. It can be in a variety of different
11 ways. Again, my organization, the Society for
12 Military History, is a prime example of that, where
13 we do have a lot of people, but these are guys who
14 don't have -- many of them don't have Ph.D.s but
15 they are still practicing.

16 Q Do you believe it is necessary to have a
17 Ph.D. in history in order to be a professional
18 historian?

19 A No. Robert Caro is not a professional. By
20 that standard, Robert Caro wouldn't count. What's
21 his name, John Meacham wouldn't count. Doris Kearns
22 Goodwin wouldn't count. But I consider them
23 historians.

24 Q Okay. Then why the focus on parts of
25 Dr. Kelman's staff did not have Ph.D.s?

1 A I didn't say that. I don't remember saying
2 that.

3 MR. GIBBONS: Court Reporter, can you read
4 back --

5 THE WITNESS: If I did, I didn't mean to
6 say that.

7 (Record read as follows:

8 "Answer: I think the standard is
9 if you were to ask someone what a
10 professional practicing historian
11 would be, when is the last time you
12 went to a conference and presented a
13 paper. When? Is the last time you
14 wrote a research that was published?
15 When was the last time -- and he did
16 for a short period of time through
17 about '95. When have you been active
18 in the profession. And, again, 'the
19 profession' is very broadly defined.
20 It is not just academics. It can be
21 in a variety of different ways.
22 Again, my organization, the Society
23 for Military History, is a prime
24 example of that, where we do have a
25 lot of people, but these are guys who

1 don't have -- many of them don't have
2 Ph.D.s but they are still
3 practicing.")

4 THE WITNESS: So I don't think I made any
5 kind of -- again, Bob Caro does not have a Ph.D. nor
6 does Meacham nor does Doris Kearns Goodwin, but most
7 people would recognize them as -- David McCullough.
8 I can give you a whole litany. So I wouldn't say
9 they had to have a Ph.D. You can be a good
10 researcher without a Ph.D. and so that is not a
11 qualification that obviously has to be there.

12 BY MR. GIBBONS:

13 Q Okay. I understand. Sorry. Maybe I
14 misinterpreted your answer. I apologize.

15 A No apologies necessary. I just didn't
16 think I had said that. If my membership found out
17 that I had said something like that, they would come
18 find me.

19 Q You acknowledged in several of your books,
20 I think specifically in Grunts, that bias always
21 enters into the process as we discussed earlier,
22 correct?

23 A Correct.

24 Q Okay.

25 A And, again, you try to test that bias and

1 again through corroboration, understanding it's
2 there, and cognizant of it, but then weighing that
3 against a variety of factors.

4 (The document referenced below
5 was marked Deposition Exhibit 9 for
6 identification and is appended
7 hereto.)

8 BY MR. GIBBONS:

9 Q I'm going to enter Exhibit 9. What is
10 going to be Exhibit 9 is an excerpt from Grunts,
11 American Combat Soldier in Vietnam.

12 You authored this book, correct?

13 A Yes.

14 Q Do you recognize this passage from your
15 book?

16 A Which one?

17 Q This entire page. Do you --

18 A Yes, I recognize the page. I'm sorry. I
19 thought you were already referring to something
20 specific.

21 Q Okay. Okay. Beginning on Roman numeral XX
22 of the text toward the end, the last paragraph says:

23 "There are many challenges in the
24 use of materials employed in the
25 study. Oral histories and memoirs,

1 even letters written at the time,
2 reflect a distance of time from an
3 event can lead to errors."

4 Did I read that correctly?

5 A Yes.

6 Q And we spoke on that earlier, correct?

7 A Yes.

8 Q It continues:

9 "The rapidness of the events and
10 the effects of personal perspective
11 must be considered. Bias always
12 enters into the process, especially
13 after the fact, when people rarely
14 seek to portray themselves in a
15 negative light. Despite these
16 challenges, the materials provide
17 insights into the experience, usually
18 corroborated time and time again by
19 other veterans relating to joining,
20 recruit training, combat, or the
21 return home."

22 Did I read that correctly?

23 A Correctly.

24 Q Okay. And as we discussed earlier, you
25 believed that you identified these -- that you don't

1 necessarily overtly identify these biases, but it is
2 an inherent part of the historian's craft?

3 A Right.

4 Q Okay.

5 A Much like it would be throughout this book.

6 Q Okay.

7 A That's why I acknowledged it up front in
8 this case.

9 Q Okay.

10 A Again, if you have time and you have the
11 setting and things like that, you are more likely to
12 be able to do this.

13 Q Okay.

14 A I'm sorry. I keep going back to timing,
15 but it is a very different beast.

16 Q I understand.

17 You said that, to your knowledge, no one
18 has ever criticized your methodology or use of oral
19 histories; is that correct?

20 A To my knowledge.

21 Q Okay.

22 A Does that mean I've read every review? No.

23 Q Okay. Are you familiar with the Journal of
24 Military History?

25 A Yes.

1 Q Do you often read it?

2 A I actually am the executive editor -- or
3 executive director of the organization.

4 Q Okay. Excellent.

5 A So yes.

6 Q I'm going to introduce what is Exhibit 10.
7 (The document referenced below
8 was marked Deposition Exhibit 10 for
9 identification and is appended
10 hereto.)

11 BY MR. GIBBONS:

12 Q If you will turn to page 2 of the exhibit,
13 which is 692. This is a review of "Grunts: The
14 American Combat Soldier in Vietnam."

15 Give you a minute to read through it.

16 A I recognize this. I've seen this one.

17 Q Okay.

18 A I can give you all kinds of context. Do
19 you have a particular point you want me to go to?

20 Q Yes. So turning the page to 693, the first
21 full paragraph reads:

22 "The author has a solid
23 familiarity with the secondary
24 sources. Longley acknowledges the
25 challenges inherent in using oral

1 histories and memoirs as source
2 materials. Some stories are hard to
3 believe (a human head kicked until it
4 exploded, a man shot 74 times before
5 being rescued). Some accounts are
6 erroneous. (Cam Lo is referred to
7 incorrectly as a coastal area; Chu
8 Lai, on the coast, is referred to as
9 being higher altitude. It took one
10 month, not months, to expel the enemy
11 from Hue.)"

12 A Hue. I'm sorry. I instinctively say that
13 Hue.

14 Q Sorry. Hue. Close parentheses.

15 "Longley includes the account of
16 one person who is exposed as a liar
17 and phony by B.G. Burkett in Stolen
18 Valor 1998. The author uses
19 provocative statistics on the number
20 of soldiers who died on their first
21 (997) and last days of service (1,448)
22 in Vietnam. His source, a website,
23 indicates that statistics are
24 unconfirmed. In these and other
25 cases, the author seems too willing to

1 uncritically accept the veracity of
2 his sources."

3 Did I read that correctly?

4 A You read it correctly.

5 Q With the exception of mispronouncing Hue?

6 A Only reason I corrected you on that first
7 time I ever said it in graduate school I said "Hugh"
8 also, and I was quickly pointed out I didn't live
9 through the Vietnam War or I would have understood
10 it was Hue.

11 Q So do you agree that this report is in fact
12 criticizing your use of oral histories and not
13 critically evaluating the veracity of your sources?

14 A If I'm not mistaken, none of those were
15 oral histories. They were memoirs, if I'm not
16 mistaken, or a particular choice of statistics.
17 Making a mistake on Chu Lai versus Cam Lo, that
18 tells you I'm not old enough to have known also what
19 the Vietnam War was. And would I say in a 300-page
20 book I have never made a mistake? No. I think any
21 historian that would ever make that claim...

22 Look at Dr. Kelman, had to admit his
23 initial -- he changed the title of his book because
24 he was misinformed in his earliest parts of his book
25 on what the location was and had to change.

1 Will I state all these? No. Again, will I
2 say mistakes can't be made? Absolutely not. Any
3 author that claims that is overstepping, but none of
4 these were oral histories that he was critiquing.

5 Q Okay.

6 A So I don't think that's as relevant to
7 that. If you want to talk about it in terms of
8 sources, yes.

9 Q The account of Individual Exposes a Liar,
10 that was not an oral history?

11 A No.

12 Q That was a memoir?

13 A Memoir.

14 Q Okay.

15 A Again, I will also point out this is a
16 master's level student from the University of
17 Kentucky who has some significant issues with PTSD,
18 which I was informed after I asked about who he was.
19 I didn't know who he was. And that they said he had
20 particular axes to grind as a Vietnam veteran. And
21 so, you know, there's some context here too.

22 Q Understood. So you were aware of that
23 review, then?

24 A I was aware of that review.

25 Q Okay.

1 A I would also call out the ones that call it
2 a monument to the Vietnam veteran.

3 Q Okay.

4 A So we can even find opposite sides
5 sometimes in book reviews.

6 Q Absolutely.

7 Okay. Apart from Mike Partain, Jerry
8 Ensminger, and Allan Howard. Did you consult with
9 any other individuals to corroborate the assertions
10 in these oral histories?

11 A Didn't have time to do so.

12 Q Okay.

13 A But they are corroborated by Command
14 Chronologies, The Globe, many other sources,
15 including the other -- what do you call it, what we
16 are doing -- depositions.

17 Q Okay. And --

18 A They are not taken on a single source.

19 Q Right.

20 A Now, we may use a section of the part that
21 is -- because one thing I always point out to my
22 students first and foremost, this isn't everything
23 that you have reviewed. There's a lot of things
24 that may not have made the cut, but corroborate the
25 story.

1 Q Would those have made the cut in your
2 reliance materials?

3 A Some would; some wouldn't.

4 Q How are we supposed to verify the veracity
5 of materials that didn't make it into the reliance
6 materials?

7 A Well, those wouldn't have made it because I
8 didn't use them, but they corroborated stories.
9 Again, redundancy. It would have been repeating the
10 same story over and over again. Much like
11 veterans -- there's the search in the Grunts book,
12 for example, is about commonalities while
13 recognizing anomalies. And I think the same goes
14 here.

15 Q Okay. All right. I want to move on to a
16 different topic, meaning not oral history.

17 A Yeah, please. I've not talked this much
18 oral history since grad school.

19 Q I want to go back to your trip to
20 Camp Lejeune with Jerry Ensminger and Mike Partain.

21 Obviously, I still haven't reviewed the
22 invoices, I don't know the particular month, but you
23 thought August, September time frame?

24 A Somewhere in there.

25 Q Okay. How long were you on the base?

1 A It is probably for five or six hours.

2 Q Okay.

3 A We drove all over the base. They showed me
4 the main areas. Showed me Onslow Beach all the way
5 up to Hadnot Point, up to where the wells originally
6 were, over to New River. And someplace off base
7 where we had a very good fish fry.

8 Q Okay. Do you remember the order in which
9 you moved through the base?

10 A I don't.

11 Q Okay.

12 A I just remember at the front gate when they
13 saw that it was Sergeant Major Ensminger, you get a
14 special respect, which I know you understand.

15 Q Did anybody else accompany you?

16 A No.

17 Q I'm going to go through a few locations on
18 the base. I just want you to confirm or deny that
19 you saw them.

20 A Uh-huh.

21 Q At Hadnot Point, did you go to the PX?

22 A Yes.

23 Q Okay.

24 A We didn't go inside because I can't get
25 access.

1 Q Okay. Did you go by the commons area?

2 A Yes.

3 Q Did go by the water-treatment plant?

4 A Yes.

5 Q And you also did not go inside that?

6 A No. Again, there's limits on what a
7 civilian -- you know this -- access.

8 Q Right. Did you go to any of the old
9 H-style barracks?

10 A Yes.

11 Q How many of them?

12 A We didn't go in, but we passed by them, and
13 I'm very familiar with those kind of facilities.

14 Q Okay. Mess halls?

15 A Didn't go inside, but they pointed them out
16 where they were.

17 Q Okay. Goettge Field House?

18 A Yes, went by it.

19 Q The main theater?

20 A Yes.

21 Q The Old Base Hospital?

22 A Yes.

23 Q The chapel?

24 A Yes.

25 Q The Harriotte B. Smith Library?

1 A Yes. Didn't go inside, but I know where it
2 was.

3 Q Any of the motor pools?

4 A Yes.

5 Q Okay.

6 A Went through the industrial part.

7 Q Did you go to the water buffalo filling
8 station, also known as a standpipe, that was outside
9 of Building 1400?

10 A Yes.

11 Q Okay.

12 A They showed me in.

13 Q Did you go to any other standpipes at
14 Hadnot Point?

15 A No.

16 Q Okay. Did you --

17 A Let me qualify that. I'm thinking back
18 memory-wise. I don't remember whether we actually
19 went to the standpipe point. I may be confusing it
20 with the photo.

21 Q Okay.

22 A So I just don't remember.

23 Q Okay.

24 A I think we did, but don't quote me on that.
25 I don't want you to have to footnote that.

1 Q Did you go to the family housing areas that
2 are serviced by the Holcomb Boulevard Water
3 Treatment Plant?

4 A Yes. Sorry.

5 Q Generally, do you remember how long it took
6 to get there from Hadnot Point?

7 A The Holcomb point -- it wasn't very long
8 there. It was a longer drive over to New River and
9 across the bay --

10 Q Okay.

11 A -- up to Camp Geiger, Camp Johnson.

12 Q Okay.

13 A We went through that area.

14 Q Let's stick with Holcomb Boulevard for a
15 minute. Did you go to the Paradise Point area?

16 A Yes.

17 Q Berkeley Manor?

18 A Yes.

19 Q Watkins Village?

20 A That one I don't recognize.

21 Q Midway Park?

22 A Yes.

23 Q Camp Lejeune High School?

24 A Yes.

25 Q The water-treatment plant?

1 A Yes. Again, I didn't go into any of these,
2 but --

3 Q Okay.

4 A Since September 11th has changed some of
5 the dynamics.

6 Q Yeah. Did you go to Tarawa Terrace?

7 A Yes.

8 Q How long, roughly, did it take you to get
9 there from Holcomb Boulevard?

10 A It wasn't very long from what I remember.

11 Q Okay.

12 A It was a pretty short drive.

13 Q Did you have to leave the main base in
14 order to get to the Tarawa Terrace?

15 A I don't know.

16 Q Okay.

17 A I know it is right over off the highway,
18 but I just don't know.

19 Q Okay. Did you see the old Tarawa Terrace
20 Water Treatment Plant?

21 A I believe so.

22 Q Okay. Tarawa Terrace Elementary School?

23 A Yes. Or at least the existing one.

24 Q Okay.

25 A Again, I don't know if we went into detail

1 whether these were new builds or they had been
2 relocated. I don't remember.

3 Q The PX that's present on Tarawa Terrace?

4 A I don't remember.

5 Q Okay. The former site of Knox Trailer
6 Park?

7 A Yes.

8 Q Did you go to the former site of ABC
9 One-Hour Cleaners?

10 A Yes. We didn't stop, but they pointed it
11 out.

12 Q Okay. Camp Johnson?

13 A Yes.

14 Q Or Montford Point?

15 A Yes.

16 Q Do you remember if you had to leave the
17 base to get to Camp Johnson?

18 A I believe we did, but I won't swear to
19 that.

20 Q Okay.

21 A Again, I'm more of spectator on this. I
22 think it is easier when you drive because you know
23 where you are going or where you are supposed to go.

24 Q Understood.

25 Did you see the Marine Corps Service

1 Support Schools?

2 A Yes.

3 Q Okay. Did you see their barracks?

4 A Yes.

5 Q Did you drive by the NCO academy?

6 A Yes.

7 Q Okay.

8 A I believe so.

9 Q The recreation center?

10 A Yes. I believe so.

11 Q The water buffalo standpipe?

12 A Again, the big one, I don't remember.

13 Q Okay.

14 A Yeah. You know, and I noted other
15 water-filling stations.

16 Q Okay. Do you recall where the other
17 water-filling stations were that you noted?

18 A I don't.

19 Q Okay. But there were multiple ones beyond
20 the ones at Hadnot Point, correct?

21 A Yes.

22 Q Okay. Do you remember if any of them were
23 on the western side of New River?

24 A I don't remember.

25 Q Okay.

1 A I'm sure there were, but I just don't
2 remember. Again, 2025 is -- or 2024 is a very
3 different place than earlier.

4 Q Understood.
5 Did you go to Camp Geiger?

6 A Yes.

7 Q Okay. Do you recall roughly how long it
8 took you to get to Camp Geiger?

9 A If I remember right, under 15 minutes.

10 Q Do you recall where you were when you
11 departed to head to Camp Geiger?

12 A I don't.

13 Q Okay.

14 A Jerry would have to explain all that. He
15 was the driver. He was the one who spent 20 years
16 there.

17 Q Okay.

18 A I was assimilating a lot of information in
19 a short period of time.

20 Q Understood.

21 Did you drive by the School of Infantry?

22 A Don't remember.

23 Q Okay. Did you drive by barracks on Camp
24 Geiger?

25 A Yes.

1 Q Okay. Any mess halls?

2 A We didn't go in any, but I remember them
3 pointing them out.

4 Q Okay.

5 A Or I believe. Again, I may be confusing.

6 Q Did you go by the PX?

7 A Don't remember.

8 Q Did you go by a gas station?

9 A Don't remember. I remember gas stations on
10 Hadnot Point, but I don't remember any -- the
11 outlying areas.

12 Q Okay. Any motor pools on Camp Geiger?

13 A Don't remember.

14 Q Okay. Marine Corps Air Station New River?

15 A Yes.

16 Q Okay. Did you go to the commissary?

17 A Passed it.

18 Q Okay. Did you pass the Marine Corps
19 Exchange?

20 A I believe so. I can't remember for sure.

21 Q The bowling alley?

22 A On Hadnot Point or the one on New River?

23 Q On New River.

24 A I don't remember that.

25 Q Okay. Were you aware there is a bowling

1 alley on New River?

2 A I think, yes, but I think that's been
3 built -- I forget when that was built, but it wasn't
4 the main one. The main one is at Hadnot Point.

5 Q Okay.

6 A The one with, like, 12 or 14 lanes. And I
7 don't know that from being inside but from the
8 newspaper, The Globe, highlighting that.

9 Q The MCAS New River movie theater?

10 A I don't remember.

11 Q The chapel?

12 A Don't remember.

13 Q Any motor pools?

14 A Don't remember.

15 Q The airfield?

16 A Yes.

17 Q Any water buffalo standpipes?

18 A Didn't see any. Or don't remember them.

19 Q Okay. I'm going to pause for a second.

20 When you say you don't remember the water
21 buffalo standpipes, can you generally describe a
22 standpipe?

23 A From my memory of what existed from the
24 photos and things, or in my report as well as
25 Dr. Brigham, we agreed to the same picture, tall --

1 well, the ones at the industry park were created, it
2 looks like, for the big -- not only the water
3 buffaloes but the big water trucks. So they were
4 probably 12 to 15 feet tall so that they could reach
5 over and go down to more effectively fill the big
6 water trucks, but then those would be used --
7 because they were flexible would be used for the
8 water buffaloes also.

9 Q Okay. Are they extremely visible items?

10 A Probably in the day. They are not today,
11 because I think there is a different system and
12 things like that in place.

13 Q Okay. Did they generally blend in with the
14 background scenery?

15 A No, they stood out -- from the photos that
16 I've seen.

17 Q Okay.

18 A Yeah. They stood out.

19 Q Okay.

20 A Because the ones at Hadnot Point in the
21 industrial center were also a number of them lined
22 up. And again, the smaller ones would not -- they
23 would reach into the water buffaloes, but they
24 wouldn't reach into, as I understand it, and through
25 the oral histories and other things, they would come

1 up over the top of the trucks because those things
2 are large machines.

3 Q Okay. Would they be unique enough to stand
4 out, to your memory, while you were driving through
5 Camp Lejeune?

6 A I don't remember.

7 Q Okay.

8 A I just don't -- like I say, a blur. A very
9 busy day with a lot of information assimilated.

10 Q Okay. Fair enough.

11 Continuing on, did you go to Stone Bay
12 Rifle Range area?

13 A Yes.

14 Q Okay. And that's currently the site of
15 MARSOC, correct?

16 A Yes. Let me qualify that. I don't know
17 that for sure. I remember MARSOC being on the
18 coast. I don't remember Stone Hill. I thought it
19 was more inland.

20 Q Okay.

21 A So I could be mistaken on that, and I
22 confused the two.

23 Q Okay.

24 A But MARSOC had a bay view.

25 Q Okay. Did you go to any of the old

1 barracks at Stone Bay Rifle Range?

2 A No, we couldn't get in.

3 Q Okay. Did you go to Courthouse Bay?

4 A Yes.

5 Q Do you remember how long it took you to get
6 to Courthouse Bay from Hadnot Point?

7 A I don't. And we may not have gone that
8 direction because we went all the way around. Like
9 I say, we'd go to Onslow Beach and then up -- if I
10 remember Onslow Beach up to where MARSOC was, so we
11 were taking some of the back roads, if I remember
12 right.

13 Q Okay.

14 A But we didn't start a trip and then go from
15 Hadnot Point to that. We were working our way
16 through. Again, Jerry knows every backwoods place
17 as well as the best places to hunt and all the
18 different things.

19 Q Did you go by the engineer school at
20 Courthouse Bay?

21 A I believe so.

22 Q Okay. Did you go by the Combat Engineer
23 Battalion?

24 A I believe so.

25 Q The Assault Amphibian Base?

1 A Don't remember that.

2 Q Okay. The area where the large amphibious
3 tractor or AMTRACs are located?

4 A Probably so. I may have just thought it
5 was a memorial or something like that. I don't -- I
6 just don't remember.

7 Q Okay. Fair enough.

8 Do you remember any motor pools being
9 present at the Courthouse Bay?

10 A No.

11 Q Okay.

12 A Again, I probably wasn't thinking about it
13 to the degree because Camp Lejeune in 2025 is a very
14 different place than Camp Lejeune in 1965 or '75 or
15 '85.

16 Q Fair enough.

17 A Forty years, quite a few things have been
18 built. Hurricanes have torn things down.

19 Q Like Hurricane Florence?

20 A Yeah, yeah. They told me about the
21 billions of dollars of damage. The one that stood
22 out to me was the one where they said that nuclear
23 weapons are stored, and I was, like, we don't have
24 to visit that.

25 Q That would be in the French Creek area?

1 A I believe so. Like I said, I didn't ask
2 them to visit that one.

3 Q Just to clarify for the record, can you --
4 just to ensure my understanding is correct, the
5 French Creek area is also serviced by the Hadnot
6 Point water-treatment plant, correct?

7 A That, I don't know.

8 Q Okay.

9 A I would be -- I don't want to speak -- I
10 won't lie. I have not got in to the same degree
11 of -- I think the water experts are the persons with
12 the reference on this.

13 Q Okay.

14 A That was not a focus. I'll put it that
15 way.

16 Q Let me rephrase.

17 A Okay.

18 Q In a more narrow context, the French Creek
19 area abuts the Hadnot Point area, correct?

20 A Yes.

21 Q Okay. It is generally --

22 A To my memory.

23 Q It is generally close and to the south of
24 the Hadnot Point District?

25 A Right. I remember as we left Hadnot Point,

1 we were going down and they say, "Nuclear weapons
2 off to the right. Bunkers there."

3 Q Okay. Thank you.

4 And I believe you already said this, you
5 went to the Onslow Beach area?

6 A Yes.

7 Q Did you see any of the recreational
8 buildings?

9 A Yes.

10 Q Okay. And then did you go to the
11 amphibious landing areas?

12 A No. That was not as easily accessible.

13 Q Understood.

14 Just a few more questions and then we will
15 break for lunch.

16 A Yeah, I'm starting to fade. I won't lie.

17 Q Don't say that. I might keep going.

18 A No.

19 Q Apart from the depositions that you were
20 provided, how did you identify individuals with
21 knowledge of the day-to-day activities on
22 Camp Lejeune?

23 A I used a lot of times like The Globe and
24 the Command Chronologies and memoirs. There were a
25 few, not many, but some that, you know -- that sort

1 of tied in to that.

2 I found some materials at the Quantico and
3 the Marine Corps archives. Now, a lot of them
4 didn't make the cut, but there were, like, photos.
5 So, again, a redundancy issue would have been in
6 play.

7 Q Okay. How did you first identify Mike
8 Partain as having relevant information?

9 A I don't remember.

10 Q Okay. Do you remember when you first spoke
11 to Mike Partain?

12 A I don't.

13 Q Okay. Do you remember roughly --

14 A Probably, I can tell you. Let me go back
15 on that.

16 I remember the first time I ever met Mike
17 Partain was when they took me -- he and Jerry took
18 me around.

19 Q Okay.

20 A That was the first personal meeting, and I
21 don't remember anything before that.

22 Q Okay. Did you ever have emails or phone
23 calls with him before that?

24 A No, I don't remember those.

25 Q Okay. So?

1 A Part -- I was going to say part of my
2 process is, as I explained in my appendix on
3 methodology, is you save oral histories and personal
4 interviews and stuff until last, until you have a
5 better understanding of all the bigger issues. And
6 because how do you ask questions about something
7 that you don't understand to begin with. How do you
8 ask about where Onslow Beach is without
9 understanding where it was or how do you ask about,
10 you know, water or whatever it may be. And so I
11 think most historians would say they save oral
12 histories and interviews and things like that until
13 the end or closer to the end so that you can have
14 some basic -- so you don't ask a question that you
15 don't really understand.

16 Q Okay. That makes sense.

17 A Yeah.

18 Q But just to be clear, when did you first
19 become aware of Mike Partain in relation to when you
20 met him at Camp Lejeune?

21 A Reading the book -- what's his name. I
22 just blanked. Trust Betrayed. Reading that book, I
23 remember Mike's story.

24 Q Okay.

25 A Just much like that book, Jerry's story is

1 featured very prominently.

2 Q Do you remember whether you read Trust
3 Betrayed?

4 A It was fairly early in the process.

5 Q Okay. So you already knew of Mike
6 Partain's existence and his story, generally, before
7 you met him, correct?

8 A Generally.

9 Q Okay.

10 A Same with Jerry.

11 Q Okay.

12 A But for the most part, I will say the
13 lawyers let me go forward on my own. I really
14 didn't get much input. I explained to him my
15 methodology, what I would be doing. And I said, "I
16 need to go to Quantico." "Go to Quantico."

17 So, again, it was not a heavy influence
18 outside. They left me alone to do my methodology.

19 Q Okay.

20 A They weren't guiding. They weren't sitting
21 over my shoulder saying ask this question, focus
22 here, focus that. I will say that.

23 Q Okay. Same question of Jerry Ensminger,
24 when did you first identify Jerry Ensminger?

25 A Same. Mike Magner's book.

1 I think that's Mike, is it not?

2 MR. HUGHES: Mike Magner.

3 BY MR. GIBBONS:

4 Q Trust Betrayed?

5 A Yeah.

6 Q Okay. Did you have any conversations with
7 Jerry before you went to Camp Lejeune?

8 A No, not that I remember.

9 Q Okay. Who brokered the trip for you to go
10 to Camp Lejeune?

11 A I'm trying to remember back. I honestly
12 can't tell you. I can't remember, now that you ask
13 me.

14 Q Okay.

15 A I was just -- I told them I'm going to
16 Quantico first, because I thought I needed to get
17 the information before I went down to Lejeune. I
18 just remember saying, "I'm going to Lejeune. I set
19 up a meeting with the Marine major at MARSOC," but
20 then he, like you said, uncomfortable, and so we
21 switched it over, but I can't tell you who brokered
22 that. I honestly don't remember.

23 Q But it wasn't Mike Partain or --

24 A No.

25 Q -- or Jerry Ensminger?

1 A No. It was one of the lawyers that put me
2 in contact with them.

3 Q Okay.

4 A Yeah. I just can't remember.

5 Q Did you know that Mike Partain and Jerry
6 Ensminger were plaintiffs at the time that you met
7 them?

8 A I think they made that point during the
9 time, but, again, I don't really remember the
10 chronology.

11 Q If you went back to review your notes,
12 would you be able to reconstruct how that happened?

13 A Probably not --

14 Q Okay.

15 A -- because I didn't take notes on that kind
16 of stuff. Like I say, I set up. I'm going to
17 Camp Lejeune that particular day, because I had to
18 work around my schedule at the university because I
19 couldn't miss certain classes, things like that. I
20 had to make arrangements. So I had a fairly tight
21 window because it was during the semester. So most
22 likely it was in September.

23 Q Okay. Understood.

24 MR. GIBBONS: All right. I think we are at
25 a natural breaking point, so why don't we go off the

1 record.

2 VIDEO OPERATOR KELLEY: This is the end of
3 Media File Number 4. We are now going off the
4 record. The time is 1:32 p.m.

5 (Lunch recess taken.)

6 VIDEO OPERATOR KELLEY: This is the
7 beginning of Media File Number 5. We are now going
8 on the record. The time is 2:56 p.m.

9 BY MR. GIBBONS:

10 Q So, Dr. Longley, before we broke for lunch,
11 we had just finished talking about your trip to
12 Camp Lejeune with Mike Partain, Jerry Ensminger and
13 roughly when you met them.

14 I just have a few more questions related to
15 your discussions with them.

16 So you said that you only spoke via direct
17 interviews with Mike Partain one time prior to the
18 rerecording of the oral history. Is that correct?

19 A To the best of my memory.

20 Q Okay.

21 A Again, I didn't keep a full track record of
22 any of that.

23 Q Gotcha.

24 A And sometimes, you know, it would be with
25 John, so if I didn't count that.

1 Q Well, yeah. For -- just for purposes of
2 the record --

3 A Okay.

4 Q -- we will consider all those attorney work
5 product privileged --

6 A Right, right.

7 Q -- materials. You can disclose you met
8 with them. Don't disclose the contents of that.

9 A Right. And, again, those are probably as
10 good a form of record because I did those at the
11 time, not -- you know, four months now.

12 Q Those -- just for the record, so you are
13 gesturing to the boxes. Are you referring to your
14 invoices?

15 A Yes.

16 Q Okay. And same recollection with Jerry
17 Ensminger, you met him at Camp Lejeune, you had one
18 interview with him, and then you conducted a
19 follow-up interview which you then recorded,
20 correct?

21 A Yes, correct.

22 Q Okay. Did Mike Partain provide you with
23 any materials directly?

24 A Just the links to his website.

25 Q Okay. And that's the TFTPTF.org?

1 A I think so.

2 Q The Few, The Proud, The Forgotten?

3 A Yeah.

4 Q Okay.

5 A But I don't remember any direct documents
6 or anything like that.

7 Q Okay.

8 A Not to my memory.

9 Q Okay. Did you ask Mike Partain any
10 questions about what you were seeing when you were
11 at Camp Lejeune?

12 A That's a good question. I don't remember.

13 Q Okay.

14 A I mean, I'm sure I asked questions of he
15 and Jerry. I just don't remember specifics on that.

16 Q Okay. Would they have been pertinent to
17 the various areas that you were going through at the
18 time?

19 A I'm sure they were.

20 Q Okay.

21 A I'm sure they were, like, tour guides.

22 Q Okay.

23 A But I don't remember asking questions.

24 Q Do you have any notes that you took while
25 you were on that trip?

1 A No.

2 Q Okay. How did you keep track of all the
3 information that you --

4 A Memory and, again, follow-up. But, you
5 know, this was more just a visualize.

6 Q Okay.

7 A As has been said, till you really walk it
8 and get a feel for it, you don't realize the
9 enormity and sort of the organization of it. You
10 can look at it on a map, but it does no justice.

11 Q Yeah. Camp Lejeune was about 110,000 acres
12 during the statutory period, correct?

13 A Yes. I don't know that per se.

14 Q Okay. And just for clarification, when I
15 say "during the statutory period," I'm speaking from
16 August 1953 to December, I think, 31st of 1987.

17 A Right.

18 Q Okay.

19 A Again, I'd have to look at the specifics.

20 Q Okay. That means that Camp Lejeune is
21 roughly the size of the Raleigh metropolitan area,
22 correct?

23 A Roughly, I believe so. I've got a section
24 in the first report that talks about that, the size.
25 How it is compared to other cities as well as other

1 counties in the state of North Carolina.

2 Q Okay.

3 A I don't have that committed to memory.

4 Q Okay. I believe you referred to
5 Camp Lejeune similar to a county with multiple
6 smaller towns that surround a county seat, which
7 would be Hadnot Point. Is that correct?

8 A That's correct.

9 Q All right. Let's talk about your reports
10 themselves for a minute.

11 A Uh-huh.

12 Q Can you go back to Exhibit 3, which is your
13 December 7th report.

14 A Okay.

15 Q Okay. Turning to page 2, the introduction.
16 Okay.

17 Towards the bottom you have your listed
18 conclusions beginning with number 1. Your first
19 opinion is that:

20 "The designers of the base
21 intentionally directed the occupants
22 to stay within the base boundaries.
23 If occupants spent more time on base
24 grounds, all else being equal, they
25 had more time exposed to its water,

1 versus time spent outside the
2 boundaries where they were not exposed
3 to or using Lejeune water systems.

4 Did I read that correctly?

5 A Yes.

6 Q When you say the designers of the base
7 intentionally directed occupants to stay within the
8 base, what do you mean?

9 A Most military bases, whether domestic or
10 foreign, the designs oftentimes were in isolated
11 areas. Jacksonville, for example, was just a little
12 fishing village before Camp Lejeune. You see this
13 throughout the country.

14 Go to Fort Hood, for example, and there's
15 not much there. You got to either go to Waco or you
16 got to go to Austin. So that was part of the
17 design. One is it was cheap land, easily accessible
18 or purchasable compared to other places. Even Camp
19 Pendleton at the time in San Diego, there wasn't
20 much there in Oceanside or Carlsbad. So what they
21 tried to do, and typically what they wanted on
22 military bases, is keep them out of trouble by
23 keeping them on base. Two, the money they spent at
24 the commissary or the PXs stayed in the system.
25 And, three, they wanted to keep them happy and they

1 wanted to keep sort of this community because it
2 built an esprit de corps.

3 Q Okay. That makes sense.

4 I want to focus on the word
5 "intentionally." So is your assertion that the
6 Marine Corps went out of its way -- or whoever the
7 creators were, the Department of War at the time,
8 the Marine Corps, whatever government entity created
9 Camp Lejeune, that they intentionally designed
10 Camp Lejeune in a way that forced the Marines to
11 stay on Camp Lejeune?

12 A As much as possible. Again, choice of
13 locations alone indicates that.

14 Q Okay.

15 A Again, find me a military base that is not
16 back to the colonial times that is in a large
17 metropolitan area. You put Fort Polk, Louisiana, in
18 the middle of a swamp for a purpose. And it is to,
19 one, keep the focus on what the main goal is, and
20 that is training -- training for combat. Two,
21 again, usually these places are more -- less
22 accessible, so land is cheaper, and during World War
23 II especially, but it started in World War I
24 especially. There was a design there, and part of
25 it was cost.

1 Q Okay.

2 A Then you have historical places like Fort
3 Huachuca that was created during the wars against
4 the Native Americans. So there are explanations to
5 a lot of these. Not all of them fit the same
6 pattern.

7 Q Interesting.

8 And by the same token, when you say
9 "intentionally directed," focusing on directed you
10 mean in some instances the Marine Corps ordered the
11 Marines to stay on Camp Lejeune?

12 A No. They wouldn't order them because there
13 are always leaves and R&Rs, but Jacksonville didn't
14 offer much. Today in 2025 Jacksonville is -- you
15 have got Walmart, you have got all the different
16 things that were not in place in 1975.

17 So, you know, the goal was not through
18 coercion but through giving them great
19 entertainment, giving them movie theaters, giving
20 them churches on base, giving them all these
21 different things that they want to stay on base.
22 And, again, it relates to keeping the money in the
23 system and the esprit de corps.

24 Q Would it be fair to say that they
25 incentivized Marines to stay on the base?

1 A That would probably be a better choice of
2 words.

3 Q Okay.

4 A Again, thinking of the PX versus -- you
5 know, before Walmart. You had to go out into the
6 community and then these shops and things like that.
7 But, you know, we especially know overseas those PXs
8 are significantly incentivized --

9 Q Right.

10 A -- for lower prices, especially alcohol.

11 Q I think you touched on something when you
12 were talking about, you know, Jacksonville today was
13 obviously much larger than Jacksonville was when
14 Camp Lejeune was first created, understandably
15 because the government was purchasing lots of land
16 for cheap purposes.

17 In your opinion, when did that begin to
18 change? When did Jacksonville begin to increase
19 exponentially in size?

20 A I would have to go back and look at that as
21 far as a census data --

22 Q Okay.

23 A -- to figure that out. I didn't look at
24 that vis-a-vis this report. I would think -- you
25 know, it is going to ebb and flow.

1 Q Okay.

2 A During the Vietnam War, the number of
3 people at Lejeune is much higher than certain parts
4 of the Cold War. Other parts. Korea -- I mean, you
5 can see junctures.

6 Q Okay.

7 A And then you would have overpopulation on
8 the base that then some people would live off base.
9 So timing is a lot -- has a lot to do with it and
10 ebb and flow.

11 Q Understood.

12 You mentioned Marines that lived off base.
13 Do you know roughly how many Marines and their
14 families lived off base?

15 A It would depend on the time.

16 Q Okay. Let's --

17 A And I don't have a -- I didn't do the -- I
18 didn't have time to do the research on that.

19 Q Okay. Would it be fair to say that more
20 Marines lived off base at the end of the statutory
21 period than at the beginning of the statutory
22 period?

23 A Don't know. And the reason I say that is
24 because during wartime -- there were a couple of
25 factors that could have influenced that. One,

1 wartime. Two, how much building they were doing on
2 base. You know, Tarawa 1 came as its own, then they
3 later added Tarawa 2.

4 Q Right.

5 A So there was building always ongoing. Even
6 today, those are the same basic principles, but I
7 don't have that definitive information.

8 Q Okay.

9 A I could find it quite easy.

10 Q Yeah, and I understand that things change.
11 I think it was Dr. Brigham's first report when he
12 was talking about the creation of Camp Lejeune, he
13 talked about originally there was only going to be
14 four regimental areas. Obviously, with the outbreak
15 of World War II, there's a much larger need to
16 create the fit regimental area. Is that your
17 understanding?

18 A Yeah, again, look at Korea. Then you get a
19 little break. Then you get to Vietnam. Then you
20 get a little break. Then you go to all-volunteer
21 force. That's why I emphasize that time and time
22 again after the mid-'70s, all-volunteer forces
23 change a lot of nature of the camp.

24 Q Okay.

25 A Better pay. Better housing allowances.

1 There's a lot of things that are starting to change.

2 Q I understand.

3 A Cheaper cars. Foreign imports. All these
4 different things start. That's why I say this is
5 not a static process.

6 Q Okay. So go to page, I believe it is 16 in
7 your report, which is Exhibit 3.

8 I believe the only time you referenced
9 Marines living off base in your report, last
10 paragraph:

11 "No matter where a person lived
12 on the base, even for the small number
13 of Marines that sometimes lived in
14 off-base housing, Hadnot Point was the
15 official county seat for Camp Lejeune
16 and people frequented -- frequented it
17 daily in many cases."

18 Did I read that correctly?

19 A Yes.

20 Q Okay. What was the basis for you
21 qualifying it as a small number of Marines that
22 sometimes lived off base?

23 A Proportionately, the number of housing
24 available to the Marines. And, again, I don't have
25 those numbers per se.

1 Q Okay.

2 A But I can say, you know, you can go and
3 look in the Command Chronologies and the number of
4 houses that were available. But, again, it could
5 ebb and flow.

6 Q Okay.

7 A Proportionately, it would have been a
8 smaller number than the majority that lived on base.

9 Q Okay.

10 A And, again, timing is important. So we
11 could amend that.

12 (The document referenced below
13 was marked Deposition Exhibit 11 for
14 identification and is appended
15 hereto.)

16 BY MR. GIBBONS:

17 Q I'm going to introduce Exhibit 11.
18 Dr. Longley, can you tell me what Exhibit 11 is?

19 A It is a copy of The Globe, but I can't read
20 the date.

21 Q Okay. I'll represent to you that this is
22 the August 29th, 1974, version.

23 A Okay.

24 Q At the bottom of it it begins with Bates
25 00897_PLG_0000059142. That Bates number indicates

1 that this was produced by plaintiffs.

2 A Uh-huh.

3 Q If you can turn to page 5, which ends in
4 Bates 59146.

5 A Yes.

6 Q Okay. In the top article labeled "Base
7 Housing: Trials and Tribulations," do you see that?

8 A Yes.

9 Q I'm going to read the bolded portion, which
10 is the third column. It says:

11 "Ms. LaGomey, the assistant chief
12 of staff, facilities was contacted
13 about your letter and replied:
14 Department of Defense policy dictates
15 that the civilian community will be
16 the major source for family housing.
17 Housing programmed for FY '75 to
18 provide 200 units for lance corporals
19 and below is in difficulty at
20 Congressional review beginning in FY
21 '76, replacement housing for Tarawa
22 Terrace II and Midway Park is
23 programmed over a five-year period.
24 This will require Congressional
25 approval.

1 "Only limited housing is
2 available in the Jacksonville area for
3 Marines in the lower ranks at
4 reasonable cost. Approximately six
5 months' wait is required for these
6 Marines for base housing. Check with
7 the base housing and rental
8 assistance. Get out and vote."

9 Did I read that correctly?

10 A Yes.

11 Q Did you know prior to reading this that the
12 official Department of Defense policy was for
13 civilian communities to be the majority supplier of
14 family housing?

15 A No.

16 Q Okay.

17 A Again, this was the ebb and flow that I was
18 talking about.

19 Q Right.

20 A It is also, if you note, 1973 is when we
21 went to the all-volunteer force.

22 Q Right.

23 A And that changed a lot of the dynamics that
24 didn't exist before 1973, in terms of pay,
25 off-campus allotments.

1 Q In your opinion, does that mean that this
2 would make sense historically for there to be a push
3 for moving more military families into the outlying
4 community rather than on-base itself with the advent
5 of the all-volunteer force?

6 A Yes.

7 Q Okay.

8 A That's what I acknowledge. That this is a
9 change over time.

10 Q Okay.

11 A And I really think that '73 is an important
12 year.

13 Q Okay. Great. Thank you.

14 A Do we need this still?

15 Q No. We are done with it. Thank you.

16 A This is one of the things, we'd give it a
17 little bit more time to flush out.

18 Q Right.

19 A Just didn't have the time to break down
20 every sentence by every time and find the details.

21 Q Yeah, I appreciate that.

22 Give me one moment.

23 (The document referenced below
24 was marked Deposition Exhibit 12 for
25 identification and is appended

1 hereto.)

2 BY MR. GIBBONS:

3 Q I'm going to hand you Exhibit 12.

4 A Okay.

5 Q Dr. Longley, did you review any of the base
6 master plans that Dr. Brigham referenced in his
7 report?

8 A I believe so. I don't think I actively
9 incorporated them.

10 Q Okay.

11 A Again, most of those were for, if I
12 remember right, for World War II and the planning
13 around World War II, which didn't fit within the
14 statutory period.

15 Q Okay.

16 A And I will say this, that was one of his
17 best sections.

18 Q Okay. Great.

19 I'll represent to you that this is an
20 excerpt from the 1986 Base Master Plan as evidenced
21 by the Bates numbers which appear in the bottom
22 right, which begins with
23 CLJA_Watermodeling_01-0000323058.

24 Can you please turn to page 12, which is
25 Bates 323136.

1 Bottom paragraph states that:

2 "Occupying the family housing
3 units listed above in June 1984 were
4 4,175 military personnel and 11,360 of
5 their dependents. At that time, 7,750
6 military and 20,305 dependents resided
7 in off-base housing."

8 Did I read that correctly?

9 A Yes.

10 Q Would you agree that in June of 1984 that
11 would imply that nearly twice as many Marine
12 families lived off base as on base?

13 A By that time, yes.

14 Q Okay. Does that comport with your
15 understanding of the number of Marines that lived on
16 and off base?

17 A Only for this snapshot.

18 Q Okay.

19 A Again, things changed significantly as
20 Jacksonville finally starts to build up more private
21 housing. They realize it is a fairly lucrative, and
22 also not everybody is living in Jacksonville. They
23 are going further south, even towards Wilmington.

24 Q Okay.

25 A So no doubt that this changed over time.

1 Q Okay. So you would agree that throughout
2 the statutory period, there's a general trend
3 towards more Marines and families living off base in
4 the surrounding community?

5 A I can't say yes because I don't have the
6 data. I've got snapshots.

7 Q Okay.

8 A I would have to look at the overall data.

9 Q Okay. That's fair.

10 A I do think it probably increased. Again,
11 off-base housing became much more prominent after
12 all-volunteer force.

13 Q Right.

14 A With better supplements for off-base
15 housing.

16 Q Right.

17 A And there was also going to be times some
18 of these units were taken out to be repaired. If
19 you have driven around right now, you will see
20 there's some, at least several that I remember,
21 falling down on themselves, and they are the older
22 ones, probably dating back to World War II.

23 Q Right.

24 A So that could change over time again. You
25 have Tarawa I and then you get Tarawa II added, so I

1 think those are all -- but I do think things changed
2 over time.

3 Q Okay. Would you agree with Dr. Brigham's
4 premise that there was constantly a housing shortage
5 on Camp Lejeune during most of the statutory period?

6 A Again, can't speak to that because, one, I
7 don't think that was the case. I think it ebbed and
8 flowed; again, depending on manpower needs.

9 Q Okay.

10 A Because the other thing about 1980 -- was
11 it '83 or '80 --

12 Q '84.

13 A '84. That's also the buildup of the Reagan
14 military, started in '81, '82. So you are going to
15 see a massive buildup of U.S. military forces during
16 that time.

17 Q Okay.

18 A Again, it is related to what's the external
19 pressures. I would actually think probably right
20 after the all-volunteer, the numbers of volunteers
21 actually went down and the size of the U.S. military
22 from '74 through about '79, '80, with the Russian
23 invasion of Afghanistan and Iranian crisis affected
24 those numbers.

25 Q In what way?

1 A That there's not -- that the military lost
2 a lot of numbers in those periods from '74 to about
3 '79, '80, when Carter started to build up over
4 Russians in Afghanistan and also the Iranian hostage
5 crisis, which Reagan then brought in and went on
6 steroids with.

7 Q Okay. Great.

8 A So, again, context, I think, is extremely
9 important.

10 Q Okay. I appreciate that.

11 A Yeah.

12 Q But you would agree that the general trend
13 towards accommodating the all-volunteer force, that
14 really began in the early 1970s, likely continued
15 through the 1980s?

16 A Likely. I don't, again, without data --
17 because, you know, the trend line could have been --
18 and I'm gesturing up and down, depending on the ebb
19 and flow. Again, I would think from '73 to '80,
20 probably the numbers were actually dwindling because
21 they were struggling to meet their manpower needs,
22 but '79, '80, definitely has an impact and Reagan's
23 election definitely changes the trajectory.

24 Q Okay. Great.

25 If you could please turn to -- look at two

1 more pages ending in 323166.

2 A 166?

3 Q Correct.

4 So this is a water usage table that breaks
5 out Camp Lejeune by the various water supply items.

6 Do you see in the second column from the
7 right it says the "Effective Service Population"?

8 A I must be looking at the wrong thing. Oh,
9 okay. Yes.

10 Q Okay. I'm going to read off the water
11 supply systems and then the effective service
12 population, if you can just confirm that I'm reading
13 this correctly.

14 A Okay.

15 Q Hadnot Point, effective service population
16 20,673?

17 A Yes.

18 Q And Holcomb Boulevard, 6,933?

19 A Yes.

20 Q Tarawa Terrace, 5,692?

21 A Yes.

22 Q Montford Point, 2,768?

23 A Yes.

24 Q Rifle Range, 1,249?

25 A Yes.

1 Q Courthouse Bay, 16 -- sorry, 1,657?

2 A Yes.

3 Q Onslow Beach, 281.

4 A Yes.

5 Q And that totals approximately 39,253,
6 correct?

7 A Correct.

8 Q Okay. And now, this does not include Camp
9 Geiger or MCAS New River; is that correct?

10 A I don't see those.

11 Q Okay. If you would flip forward two more
12 pages to 323355.

13 A Got it.

14 Q This is a similar table, but this one does
15 include or is only for MCAS and Camp Geiger,
16 correct?

17 A Uh-huh. Yes.

18 Q And it was MCAS/Camp Geiger effective
19 service population, 11,642?

20 A Right.

21 Q Okay. So all told, that's approximately
22 50,000 people, correct?

23 A Correct.

24 Q Does an effective service population of
25 approximately 50,000 people in the 1980s comport

1 with your understanding of the size of Camp Lejeune?

2 A To the best of my knowledge.

3 Q Okay.

4 A I don't have the exact numbers.

5 Q Okay. Do --

6 A Let me ask you this. Do we know if
7 affected service population includes civilians
8 coming on base? Do you know if that's the case?
9 Because that would seem to be an important question.

10 Q Yes. Stand by.

11 If you will turn back three pages to the
12 one ending in 323165.

13 A Yes.

14 Q Bottom paragraph says:

15 "The effective service population
16 data shown in Table IV-8 were
17 developed from data indicating where
18 military and civilian employees work
19 and where military personnel and their
20 dependents reside."

21 A Okay.

22 Q Did I read that correctly?

23 A Yes.

24 Q Okay.

25 "The calculated data for the

1 affected service population takes into
2 account proportional parts of each day
3 that military and civilian personnel
4 and dependents of the military
5 personnel would be in each service
6 area."

7 Did I read that correctly?

8 A Yes.

9 Q Okay. Given that -- do these numbers
10 comport with your understanding of the relative size
11 of the Camp Lejeune population?

12 A I guess I'm unclear on how they are doing
13 an average of the civilian and military and
14 dependents.

15 How does that tie to, say, Hadnot Point
16 20,673?

17 Q That part is not clear to me --

18 A Okay.

19 Q -- from this exhibit.

20 A Yeah. Because without that, I don't think
21 you can tell exactly how many -- you know, how many
22 of these count as civilian, how many of these count
23 as military.

24 Q Okay. Well, setting aside the difference
25 between military and civilian, does that match your

1 general understanding of how many personnel would
2 have been present on a daily basis in each of these
3 areas?

4 A I don't have that information.

5 Q Okay.

6 A I didn't -- again, what I would want to see
7 is go back and let's take some snapshots, '55, '65,
8 '75, '85, and then we can see something of a line.

9 Q Okay.

10 A But with this data, like I say, until I
11 could get that one question answered, it would seem
12 to be extremely important.

13 Q Okay. Let's set aside the absolute numbers
14 for a minute --

15 A Okay.

16 Q -- and talk about relative numbers.

17 So obviously you will see that Hadnot Point
18 is larger than all of the other areas.

19 A Yes.

20 Q Is that correct?

21 Proportionally, do these numbers seem to
22 make sense with the relative populations of these
23 areas?

24 A Again, I'm not sure given the -- what their
25 numbers are vis-a-vis the civilians that are being

1 averaged into this.

2 Q Okay.

3 A Again, I'm -- it is the math nerd in me.

4 Q Fair enough.

5 A And I would need to have full information.

6 Q Okay.

7 A Are we done with that?

8 Q Yes, we are done with that.

9 A Okay. I'm trying to keep them in order.

10 Q Okay. Going back to your report on page 2,
11 your second opinion was:

12 "A substantial part of the
13 overall demographic historically was
14 composed of young male Marines (under
15 the age of 25), and they typically
16 lacked cars during much of the
17 relevant time period. They relied
18 heavily on the internal bus system and
19 walking to access different services
20 on the base. It was very different
21 from ordinary American environments
22 today in which cars are ubiquitous.
23 This, again, contributed to the
24 behavior of staying on base."

25 Did I read that correctly?

1 A You are correct.

2 Q As we discussed earlier, you wanted to
3 amend this specific portion of your report to
4 acknowledge that there were more cars on the base in
5 later parts of the statutory period, correct?

6 A Correct.

7 Q Okay.

8 A Which, again, would then speak to the --
9 not needing to take the bus. Although the bus
10 systems always were very important, because even
11 with the increase in pay in 1974, to start with the
12 recruiting, a lot of these people were still making
13 a very small -- especially E3s and below which still
14 constitute a large portion of the Marine Corps.

15 Q Understood.

16 Do you think that the bus system was less
17 convenient for moving around the base than using
18 cars?

19 A It probably would have been.

20 Q Okay. Do you think that had any reducing
21 effect on the amount of mobility that young Marines
22 without cars had on the base?

23 A Well, I think we have to qualify. In this
24 case, most of the young Marines would have been at
25 Hadnot Point because that's where the barracks were.

1 That's where the single people lived. And that's
2 where the center of life was, a lot of the training
3 and everything like that.

4 So I think that's important to keep as far
5 as a context.

6 Q Okay. Fair enough.

7 A But I do think later cars, you know,
8 probably in the '50s and '60s, it was more officers
9 or E6s were more likely to be able to afford a car.
10 But, again, by the mid-'70s it is going to change
11 because of cheaper imports as well as higher pay.

12 Q Okay. And just to clarify for the record,
13 E6 is an Enlisted-6 --

14 A Yes.

15 Q -- which is a pay grade denoting a staff
16 sergeant in the Army and a gunnery sergeant, I
17 believe, in the Marine Corps?

18 A I believe so. You probably know this
19 better than I.

20 Q It has been a minute.

21 A No, but I will trust you on that. But,
22 again, it is a change over time.

23 Q Understood.

24 But there were Marines that resided in
25 other parts of the base, correct?

1 A Yes.

2 Q Okay. And other parts of the base that
3 Marines would reside in were, say, the Camp Geiger
4 for the School of Infantry, correct?

5 A Yes. Correct. For their first AIT
6 doctrine.

7 Q Or the cadre that were currently stationed
8 there.

9 A Exactly.

10 Q The same applies to Camp Johnson, correct?

11 A Yes.

12 Q Including Master Sergeant Ensminger,
13 correct?

14 A I believe so, but he lived there a number
15 of different places during his time there, if I
16 remember right. His first duty station, I believe,
17 was Okinawa and then he came back.

18 Q Okay.

19 A But I could be wrong on that.

20 Q Courthouse Bay, same scenario?

21 A Right.

22 Q Primarily a school, some small units,
23 correct?

24 A Right.

25 Q Okay.

1 A And I think you can get that from what you
2 raised earlier, in terms of looking at the effective
3 service population, and I think we would probably
4 see some proportionately, although that could have
5 changed over time.

6 But if you look at Courthouse Bay 1657
7 versus 20,673.

8 Q Okay.

9 A And, again, I think some of these outlying
10 areas had grown some by the mid-'80s.

11 Q Okay.

12 A Because if you're -- '84 or '85?

13 Q I believe the data was from '84.

14 A Okay. And, again, I would need to see data
15 from '55, '65, '75 and see the proportionality. But
16 a lot of these E2s, 3s, private and corporals, would
17 have been stationed at Hadnot Point.

18 Q Right. After they completed their school
19 training?

20 A Right. After they completed their school
21 training.

22 Q Okay. And those are also the same
23 personnel that would have had the least access to
24 cars early on in the statutory period, correct?

25 A Exactly.

1 Q Okay.

2 A As one explained to me, the idea that, you
3 know, it was a very expensive cab ride over to
4 Jacksonville. And most of them weren't going except
5 for the strip joints and other things that sometimes
6 populate around military bases.

7 Q Okay. Do you remember who told you that?

8 A I can't right off the top of my head.

9 Q Okay. Would it be in your reliance
10 materials?

11 A I'm sorry?

12 Q Would that be in your reliance materials?

13 A I can't remember. Sorry.

14 Q Okay. And MCAS New River, largely in a
15 separate bucket because it is its own military
16 installation, effectively. The units that are there
17 for the air wing were permanently stationed there,
18 correct?

19 A Right.

20 Q And that's why MCAS never had its own
21 full-service commissary in the Marine Corps
22 Exchange, correct?

23 A They had it, but it grew over time. It
24 wasn't in '55 the same as it was in '85.

25 Q Correct. I mean, that's true of everything

1 on Camp Lejeune?

2 A Exactly. And, again, by '85 I think it is
3 moving a little bit more towards the peripheries,
4 but that was not the case, per se, in '65.

5 Q Okay.

6 A I think, you know, the New River group
7 significantly in the '70s and '80s.

8 Q Okay. Fair enough.

9 I want to go back to something. I think
10 you brought up, very astutely, regarding the
11 affected service populations in these different
12 parts of the base in terms of proportionality. So
13 the schools that were at Camp Geiger, Camp Johnson,
14 Courthouse Bay, they had more throughput than, say,
15 the permanent units that were stationed at Hadnot
16 Point; is that correct?

17 A Throughput? I'm not familiar with that
18 term.

19 Q So throughput meaning there were smaller
20 numbers of Marines at any given time, but they were
21 usually there for a shorter period of time, correct?

22 A Are you saying on these outlying areas?

23 Q Correct.

24 A Yes.

25 Q Okay. Usually for only a few weeks at a

1 time before being assigned either to Hadnot Point or
2 another installation?

3 A Exactly. Especially, again, advanced
4 infantry training. I think by -- again, it depends.
5 During the Vietnam era, it was only four to five
6 weeks, for Marines it was three weeks. Let me
7 qualify that. Actually I spoke backwards.

8 During Vietnam from '66 to about '68 the
9 average time in AIT was three weeks, and then many
10 ended up being shipped off immediately to Vietnam.

11 Q Understood.

12 And because of that, a momentary snapshot,
13 as you characterize it, wouldn't necessarily capture
14 the entire population that was in that area over the
15 course of, say, a year, correct?

16 A It would be difficult to do so because
17 there is going to be movement in and out.

18 Q Right.

19 A And, again, during wartime, cycling out in
20 terms of who is going to Vietnam and who is coming
21 back. You know, it would depend. We would have to
22 have complete snapshots.

23 Q So if -- hypothetically or rough numbers,
24 so if, say, to take your example, the AIT was three
25 weeks during the height of the Vietnam, let's say

1 they had back-to-back courses, that there were no
2 overlap between them, that would have been roughly
3 15 classes a year, correct?

4 A Correct.

5 Q Assuming that there was -- so the number of
6 Marines that were in, say, Camp Geiger for the AIT,
7 infantry AIT, over the course of a year would be
8 roughly 15 times at any given time, correct?

9 A Right. But it would have been a short
10 cycle.

11 Q Right.

12 A Again, three weeks versus being assigned to
13 the 2nd Marine division or the 4th, so.

14 Q Okay. And that applies both to the school
15 of Infantry, engineer school at Courthouse Bay?

16 A I think engineering school was a little
17 longer than that. Some of the schools -- again, it
18 is a snapshot. Again, during Vietnam the manpower
19 needs were very different than they were in 1961.

20 Q Right.

21 A So I think we have to be careful, you know,
22 in terms of over time.

23 Q Right. And I'm not talking about the
24 specific numbers --

25 A Right, no.

1 Q -- cited in this, but conceptually the same
2 principle applies, that the schools have more
3 Marines passing through them over the course of a
4 year than at any one given time, correct?

5 A I'd have to think about that.

6 Q Okay.

7 A I'm not sure defining one particular
8 time -- because you would be more likely to have
9 been stationed all year long. So you joined the
10 AIT, then you go into the second regiment. You are
11 going to be stationed primarily, if you're a -- you
12 know, a single, you are going to be over in the
13 Hadnot Point area.

14 Q Okay.

15 A So you would be there, there's three
16 weeks -- there's 52 weeks in a year. Forty-nine of
17 the weeks of the year would be at Hadnot Point.

18 Q Okay.

19 A Again, I would have to do a lot more
20 research on that.

21 Q That's fair.

22 I'm sorry, can we go back to -- I think you
23 still have it open Exhibit 12 in front of you.

24 If you can turn towards the front, the page
25 ending in Bates 323061.

1 A Yes.

2 Q Okay. Table 3-1 is the Personnel Loading
3 1983 and Programmed Strength FY 1989 for the
4 Camp Lejeune Complex. Did I read that correctly?

5 A I'm sorry, I'm just catching up. I am
6 slowing down a little bit.

7 Say that one more time.

8 Q The table is titled "Table III-1 Personnel
9 Loading" --

10 A Yes.

11 Q "1983 and Programmed Strength FY 1989" --

12 A Right.

13 Q -- "Camp Lejeune Complex;" correct?

14 A Yes.

15 Q I'll give you a minute to study this
16 exhibit.

17 A Okay.

18 Q Okay. So for -- it breaks it down by
19 column. Now, this one is focused on military
20 personnel, correct?

21 A Yes.

22 Q Okay.

23 A Yeah. Because total civilian projected is
24 totally absent.

25 Q Right.

1 A Even though they give numbers at the
2 bottom.

3 Q Right. So in the second column from the
4 right. "Total Military 1983," it lists permanent
5 units without a location as 2,553; is that correct?

6 A Under Permanent Units under '83?

7 Q Correct.

8 A I'm looking at 212/18. Which one am I
9 missing -- oh, way over. Oh. Total. Okay. Sorry.

10 Q I'm sorry. I believe you are in the
11 Officers column.

12 A Yeah. I was in the Officers and didn't
13 make it far enough.

14 Q That's okay.

15 A So 2500 versus 3300. Again, this makes
16 perfect sense. This is in the Reagan buildup.

17 Q Okay. And then students is listed as
18 2,654, correct?

19 A Right.

20 Q Okay. Versus the 2nd Marine Division
21 20,082, correct?

22 A Correct.

23 Q Okay.

24 Then I notice that it's odd but that in
25 1983 to the projected for 1989 the number of

1 students increases, but the size of 2nd Marine
2 Division decreases; is that correct?

3 A That appears correct.

4 Q Okay. And the 2nd FSSG, which I believe is
5 2nd Force Service Support Group --

6 A Right.

7 Q -- is listed as 9,840 for 1983.

8 A Right.

9 Q The Force Service Support Group is
10 primarily at French Creek, correct?

11 A I believe so. I'd have to double-check
12 that.

13 Q Okay.

14 A I won't lie and say I tracked every unit
15 every place for every year.

16 Q Okay. Fair enough.

17 And then skipping down to the bottom of
18 that column, there's a subtotal of 35,621. That
19 includes all those various units, correct?

20 A I must be missing -- did we stay on the --
21 okay. I went down one extra line. Yes.

22 Q And then below that there's some numbers
23 for Naval Hospital --

24 A Right.

25 Q -- Naval Dental and, then another set of

1 numbers for the MCAS, right?

2 A Right.

3 Q MCAS is listed as 4,992.

4 A Correct.

5 Q Then the total for Camp Lejeune and MCAS
6 was listed at 41,221 military personnel for 1983,
7 correct?

8 A Right.

9 Q Okay. Did those numbers match your general
10 understanding of the size of Camp Lejeune's military
11 personnel during the Reagan buildup?

12 A I would have to double-check that.

13 Q Okay.

14 A I don't have that number off the top of my
15 head. What I'm doing is comparing numbers over here
16 on the other about the effective service population
17 of both these, and these numbers would add up to
18 about just over 51,000.

19 Q Uh-huh.

20 A So let me go back over then to these other
21 numbers. That might answer our question about how
22 many of these were considered as far as civilians.

23 I'm not used to front and back.

24 So I guess we could sort of guess at the
25 civilian element because the total numbers over on

1 the other were 50,000 -- or 51,000 and these are
2 41,000.

3 Q Okay. Then going back, broad scale, these
4 various numbers, those wouldn't necessarily all be
5 present on Camp Lejeune at any one given time,
6 correct?

7 A Correct.

8 Q There are things to take into account like
9 leave, deployments, things like that?

10 A Training at Fort Bragg.

11 Q Training at Fort Bragg.

12 A You know, we see a number of places where
13 they are training in Norway and training, you
14 know -- in '83 you would have to think this was
15 projected, our '83, because the Marines that were in
16 Beirut were 2nd Marines, if I'm not mistaken, from
17 Camp Lejeune, and they would get -- they will get
18 hit hard. So those numbers could reflect that too.

19 Q Okay. And I just want to clarify for the
20 record, when I said could include Marines that were
21 not present for leave purposes, you were nodding.
22 You meant "yes," correct?

23 A Yes.

24 Q And then same for deployments, that would
25 mean that those personnel were also assigned to

1 Camp Lejeune but not physically present at
2 Camp Lejeune during those deployments, correct?

3 A Correct.

4 Q Okay. Okay. I think I'm done with this
5 exhibit again.

6 A Okay. Now you have me curious on the
7 numbers.

8 Q Okay. Going back to your report, flipping
9 to page 3. Your third opinion was that:

10 "As a related aspect to the base
11 storage being self-contained, there
12 was ample opportunities for social,
13 recreational, and other such events on
14 base, including at facilities
15 geographically located in the Hadnot
16 Point, Tarawa Terrace, and the Holcomb
17 Boulevard areas during the relevant
18 time period as discussed below."

19 Did I read that correctly?

20 A Yes.

21 Q Were there opportunities for social,
22 recreational, and other events on other parts of the
23 base?

24 A Yes.

25 Q Okay.

1 A Which I acknowledged, I think, in Report 3.

2 Q Okay.

3 A This is not a static group.

4 Q Right.

5 A There is constant movement on this base
6 through the bus system, through later cars, a
7 variety of things that would carry them to different
8 parts of the base --

9 Q Okay.

10 A -- with Hadnot Point still being the
11 centerpiece with the best facilities, the most
12 cultural activities.

13 Q It has the largest population, so the most
14 facilities are there?

15 A The most facilities. The main PX. And,
16 again, when I asked for numbers on what -- these
17 outlying areas, they may be there to tell me how
18 many people shopped at the PX. I know how many
19 people shopped at the PX at the -- at Hadnot Point,
20 over 230,000 a month. So, you know, not 230-,
21 23,000 a month. So 700 a day, basically.

22 Q Right.

23 A And so we never saw the information, it was
24 never produced, how many were using the PX at New
25 River or the swimming pools.

1 Q That's an interesting point.

2 So do you remember offhand -- we can go to
3 your report and check -- what year the 23,000
4 shoppers a day at the main PX was?

5 A It is in here.

6 Q Or main commissary?

7 A I'd have to look. I mean, I can find it.
8 It just may take a little while.

9 Q That's fine.

10 Did you find it?

11 MR. HUGHES: It is at page 20 of his second
12 report.

13 MR. GIBBONS: The second report.

14 THE WITNESS: Okay. The January 13th
15 report.

16 MR. GIBBONS: Okay.

17 MR. HUGHES: Page 20, and the article is
18 from October 1981.

19 THE WITNESS: So that's from '81.

20 BY MR. GIBBONS:

21 Q Okay. So in close proximity timeline-wise
22 to the 1984 numbers that we talked about then,
23 right?

24 A Yeah.

25 Q So 23,000 grocery customers each month

1 would it be somewhere between half and 4/5 -- or 2/5
2 of the population of Camp Lejeune based on the
3 effective service that we saw?

4 A Right.

5 Q I mean that's less than half the
6 population, right? So --

7 A It is half the population, but, again, this
8 is '81 -- or '84 versus '65, '75.

9 Q Okay.

10 A There is no doubt by the mid-'80s, they
11 were putting more effort into New River, some of
12 these outlying areas.

13 Q Okay. And the city of Jacksonville itself?

14 A And the city of Jacksonville.

15 Q Okay.

16 A So there's no doubt these things were
17 changing. Again, I think we probably went back and
18 the Command Chronologies would have this information
19 of how many hundreds of thousands -- because that's
20 one other thing that I think we have to point out,
21 is the commissary on -- at Hadnot Point is going to
22 be the equivalent of Walmart where the outlying
23 areas might be the equivalent of a 7-Eleven in some
24 cases or maybe a small grocery store. So we would
25 have to look and compare and contrast those numbers.

1 Q Okay. Back to the report.

2 So going with that same thought, then,
3 would the Marine Corps have developed recreational
4 facilities in other parts of the base to alleviate
5 the need to go to Hadnot Point to a limited extent?

6 A Over time.

7 Q Okay.

8 A Again, I don't think it's the same in '85
9 that it was in '75 and then going backwards.

10 Q Okay. But generally the Marine Corps at
11 the time knew that young service members that lacked
12 cars, it is not particularly convenient for them to
13 have to hop on a bus and go to Hadnot Point to do
14 anything from, like, going to a gym or --

15 A Well, the majority actually chose to do
16 that --

17 Q Okay.

18 A -- from what I can see and what the record
19 says because -- for example, I remember seeing a
20 story on early '70s about the Nautilus machine. And
21 you guys are way too young, but those of us that are
22 old enough to remember when that was, like, the
23 cutting edge that drew people to the gym, and
24 that's -- and they were primarily at Hadnot Point.
25 Hadnot Point would have the equivalent of -- you

1 guys may not know this -- Lifetime Fitness, which is
2 sort of crème de la crème of gyms, as opposed to --
3 what's the sort of more the -- EOS Fitness.

4 Q Okay.

5 A So they would have better facilities,
6 better swimming pools. A number of things were
7 better. And, as Mr. Ensminger reminded me, they had
8 something that these outlying areas typically didn't
9 have and that was single women. Which the
10 majority -- all the -- for the most part through the
11 '80s, the women in the Marine Corps were stationed
12 at Hadnot Point as well as the nurses, and the
13 single -- and I qualify that as single females.

14 Q Okay.

15 A And we know there's never been a male in
16 their life that that was a driving factor.

17 Q Okay.

18 I'm going to introduce Exhibit 13. Before
19 we delve into this, I just wanted to clarify, it's
20 just stuck in my mind, the single women you were
21 referring to, you are referring to women either with
22 the Marines or Navy nurses, correct?

23 A Yes. Single women, Marine Corps members,
24 which only probably even through the '80s
25 constituted about 10 percent.

1 Q Okay.

2 A But when -- 10 percent is better than the
3 90 percent being stuck in and, again, nurses -- in
4 fact, they had a race riot break out because a nurse
5 decided to dance with one guy over the other.

6 Q Fascinating.

7 A Yeah. It was a -- people died in '69 --
8 '69 to '70 because an African American nurse danced
9 with a white guy, and that started a cascading
10 effect.

11 Q I'm sorry, hold on.

12 MR. GIBBONS: What are we at on the record
13 right now?

14 VIDEO OPERATOR KELLEY: Total four hours,
15 16 minutes.

16 MR. GIBBONS: Okay.

17 (The document referenced below
18 was marked Deposition Exhibit 13 for
19 identification and is appended
20 hereto.)

21 BY MR. GIBBONS:

22 Q Dr. Longley, I just handed you what is
23 Exhibit 13.

24 A Uh-huh.

25 Q Do you recognize this document?

1 A I have not looked through the telephone
2 directory.

3 Q Okay.

4 A I didn't have access to this.

5 Q You weren't given access to all the
6 produced documents in this litigation?

7 A I was, but it didn't get through
8 everything.

9 Q Okay.

10 A I didn't have a large group of staff to
11 help me. This was read everything by myself.

12 Q Understandable. But you did have access to
13 everything that I produced?

14 A I'm sure I did. This just didn't cross my
15 path.

16 Q Okay.

17 A Again, I ran out of time.

18 Q Fair enough. We all do. Hopefully not
19 today.

20 A Oh, well. Sooner the better in my opinion,
21 but that's just my opinion.

22 Q Right. Okay.

23 So the Bates numbers in the bottom right
24 demonstrate that this was a produced document.

25 A Uh-huh.

1 Q This is the 1959 -- June 1959 telephone
2 directory for Camp Lejeune, North Carolina, correct?

3 A It looks that way. Again, I can't verify
4 because I haven't had -- or I haven't looked at it.

5 Q Okay.

6 A I'm going to take your word on it.

7 Q Okay.

8 If you can turn to the page ending in
9 74367. It is about 50 pages in.

10 A Say that again, please.

11 Q 74367.

12 A Got it.

13 Q On the left-hand side, you see where it
14 says "Service Clubs"?

15 A Uh-huh.

16 Q Okay. And then there's a list of
17 locations, and then there's to the right building
18 locations and phone numbers, correct?

19 A Yes.

20 Q Okay. So under Service Clubs, it lists
21 Area 1, Area 2, correct?

22 A Yes.

23 Q Area 4, correct?

24 A Yes.

25 Q Area 5?

1 A Yes.

2 Q Okay. And those would -- corresponded to
3 the regimental areas at Hadnot Point, correct?

4 A I believe so. I don't have -- I can't
5 confirm that.

6 Q Okay. Would we be able to confirm that
7 using the building locations?

8 A I think so.

9 Q Okay. Below that it says Camp Geiger 2?

10 A Yes.

11 Q And Camp Geiger 3?

12 A Yes.

13 Q And Central Area, I assume that's also
14 Hadnot Point?

15 A Yes.

16 Q Okay. Courthouse Bay?

17 A Yes.

18 Q Montford Point?

19 A Yes.

20 Q Rifle Range.

21 A Yes.

22 Q Stone Bay?

23 A Yes.

24 Q Would that indicate that there were service
25 clubs in these other areas?

1 A Yes, there were, but the problem is -- and
2 I'm trying to get to the point. I've got a section
3 there which talks about -- it may be in the last
4 report, sorry. I don't have the immediate memory on
5 this.

6 I'm looking for a document. I'm sorry, I
7 don't, again, have immediate recall.

8 Q That's fine. It's your report.

9 A Too many pages.

10 Can you see -- do you remember the one --

11 MR. HUGHES: What are we looking for?

12 THE WITNESS: I'm looking for the one that
13 has advertisement for the S -- Senior
14 Noncommissioned Officers Club. And then right
15 beneath it is listed the others and what activities
16 were available. And it makes the point that -- I'm
17 sorry, like I said, I'll find it here. I'll find it
18 probably later, about time I'm leaving -- oh, here
19 it is. Page 19 on the January report.

20 BY MR. GIBBONS:

21 Q Okay.

22 A Page 19. Just to make the point. On
23 advertisement in The Globe from January 1956.

24 Q Okay.

25 A 20th of January.

1 "Hadnot Point -- Dance Friday
2 from 8:30 to 12:30 a.m. with music by
3 Jimmy West and his Tradewinds Dance
4 Band. Saturday 8:30 until 12:30.
5 Dance Sunday from 8:30 to 12:30
6 featuring Billie Tillis and the
7 Versi-Tones. Special steak dinner
8 Sunday for \$1. Sammy Audrain at the
9 piano Sunday afternoon. Monday,
10 cocktail hours from 7:00 to 9:00.
11 Tuesday features Fun night 8:00 p.m.
12 with free drafts are served Wednesday
13 at 7:00 p.m. Complete breakfast
14 served every day from 8:00 a.m. until
15 1:00 p.m.

16 "At Geiger - Happy hours on
17 Thursday from 4:30 to 6:30. Cocktail
18 hours Sunday from 3:00 p.m. to
19 5:00 p.m.

20 "At Montford - Fun night and
21 Happy hours Wednesday night."

22 Just to make the point that there is
23 significant differences in what is provided by -- at
24 different points.

25 Q Okay. That's fair enough. I don't think

1 anyone is contesting that.

2 A Yeah.

3 Q But it underscores the point that the
4 Marine Corps did try to provide facilities for
5 recreation, even within a limited capacity, at other
6 areas of the base, correct?

7 A Correct. I don't deny that.

8 Q Okay. In particular at Camp Geiger and
9 Camp Johnson where it is a majority of transient
10 population of trainees?

11 A I can't testify to that because I -- I
12 didn't see any of that reinforced in the materials
13 that I viewed.

14 Q Okay.

15 A So I wouldn't make that assumption, but I
16 also can't deny it.

17 Q Okay. That's fair.

18 Okay. And then same point further down on
19 page 74367.

20 A I'm sorry, I lost it.

21 Q That's fine.

22 A 7437?

23 Q 74367.

24 A Okay. 67. I'm almost there.

25 Okay.

1 Q Okay. Then toward the bottom of the page
2 on the left it says, "Staff NCO Clubs"?

3 A Uh-huh.

4 Q Similar to the ones we were just
5 discussing --

6 A Right.

7 Q -- in your second report. It was the Camp
8 Geiger Club, correct?

9 A Yes.

10 Q Camp Geiger office, Courthouse Bay Club,
11 correct?

12 A Yes. I'm sorry.

13 Q Hadnot Point Club?

14 A Yes.

15 Q And Montford Point Club?

16 A Hadnot Point Office and then Montford Point
17 Club.

18 Q Okay. So, again, there were facilities at
19 these outlying areas?

20 A Yes.

21 Q Perhaps not as robust as the ones offered
22 at Hadnot Point, right?

23 A Right. I think this one little clip shows
24 that significantly more was done for these areas
25 where the majority of the young enlisted men were.

1 And the staff noncoms as opposed to these outlying
2 areas.

3 If I remember right, and I don't know if
4 this is in the report, I don't think it is. But
5 Jerry made a point about, you know, these outside --
6 outlying areas might have a few tables and, you
7 know, some beer for sale.

8 The problem, again, there's a major theme
9 missing in those outlying areas, and that's women.

10 Q Understood.

11 A Yeah. Whether they, you know, had any
12 interest or not, young men don't always have the
13 most realistic appraisals of what the world is like,
14 including my kids.

15 Q Okay. If you will turn to the very next
16 page, 74368.

17 A Uh-huh.

18 Q See halfway down the page on the left side,
19 it lists theaters, correct?

20 A Yes.

21 Q And there's Camp Drive-In, correct?

22 A Yes.

23 Q Camp Theater, which I assuming is the main
24 one at Hadnot Point?

25 A Yes.

1 Q Okay. Camp Geiger Indoor?

2 A Yes.

3 Q Camp Geiger Outdoor?

4 A Yes.

5 Q Courthouse Bay Indoor?

6 A Yes.

7 Q Marine Corps Air Facility?

8 A Yes.

9 Q The precursor to MCAS New River?

10 A Right.

11 Q Montford Point Indoor?

12 A Yes.

13 Q Naval Hospital?

14 A Yes.

15 Q Paradise Point?

16 A Yes.

17 Q Rifle Range?

18 A Yes.

19 Q And then there's various theater --

20 A Right.

21 Q -- things.

22 So same concept, maybe not as nice as
23 Hadnot Point, but there are other facilities that
24 Marines can use in a pinch?

25 A Yeah. As I've heard some of them describe,

1 is basically it was like watching the old TV series
2 Mash and how they showed their movies like we used
3 to watch football film, and they just put it up on a
4 thing. Same goes with the outdoor theaters. That's
5 what has been described as opposed to the main
6 theater at Hadnot Point which hosted people like
7 Frank Sinatra, Lou Rawls, and the Marine Corps band
8 during Christmas season.

9 Q Okay.

10 A So definitely a disproportionate amount of
11 interest and focus on Hadnot Point.

12 Q Okay. And the one at Marine Corps Air
13 Facility was probably the second nicest after Hadnot
14 Point?

15 A I can't testify to that because I don't
16 know when they started putting more emphasis out
17 there. I would think probably knowing that the air
18 corps, whatever branch it is, gets more emphasis and
19 typically the better facilities and the better food,
20 I would think there's probably a valid point there.
21 But I can't tell you when that would have occurred.
22 Because the Marine Corps air arm was never as
23 prominent, of course, as the Air Force or the Navy.
24 You know, you look in terms of their -- weapons in
25 terms of their aircraft, they never got the same --

1 they still don't. I mean, they are still forced to
2 fly those Ospreys, and God knows where those are
3 going to go.

4 You get the joke.

5 Q I do. Having ridden in an Osprey, I will
6 never do so again.

7 A That's the way most of my friends that are
8 Marines say also, but I think it reflects on where
9 the priorities are.

10 Q Okay.

11 A Much like the Marines are doing away --
12 they have done away with their tanks.

13 But I think this would have been good if
14 Dr. Brigham had been able to say, all right, let's
15 look at how many people are in this theater a week.

16 Q Uh-huh.

17 A If you are going to make that argument that
18 these were out there, compare and contrast. Tell me
19 how many were, you know, at Camp Geiger on a weekly
20 basis. Also show me the facilities.

21 Q Assuming those records exist.

22 A Assume they do exist, but I would think you
23 might could infer it from some of the Command
24 Chronologies. But that was not my -- what I focused
25 on because I was focusing on here are the facilities

1 at Hadnot Point. Here is how The Globe covers them.
2 The Globe hardly ever shows the outlying areas.

3 Q Okay.

4 A Which is in its own right a statement.

5 Q Fair enough.

6 Well, rather than waste time with
7 additional exhibits, would you agree that there were
8 similar smaller, but no less present, facilities for
9 the Marine Corps exchange in these outlying areas?

10 A Yes.

11 Q As you described, sometimes convenience
12 stores sometimes a little bit larger maybe for MCAS?

13 A Right. Yes.

14 Q Okay.

15 (The document referenced below
16 was marked Deposition Exhibit 14 for
17 identification and is appended
18 hereto.)

19 BY MR. GIBBONS:

20 Q Introduce Exhibit 14. Dr. Longley, I've
21 just handed you Exhibit 14.

22 A Uh-huh.

23 Q This is what we referred to as base guides.
24 Are you familiar with these?

25 A Yes.

1 Q Okay. These were documents that
2 Dr. Brigham's team found when they were doing their
3 research at Camp Lejeune.

4 A I've seen these.

5 Q Okay. Now, I apologize, the Bates numbers
6 were supposed to be printed, but they were cut off
7 during the printing process.

8 A Understood.

9 Q Luckily, however, they do have regular page
10 numbers at the bottom.

11 A Uh-huh.

12 Q If you would turn to page 125.

13 A I'm missing -- what am I looking for?

14 Q Hold on.

15 A Under the Classified Buying Guide?

16 Q I'm sorry, give me one second.

17 A Okay. Page 7 for the buying guide. I'm
18 trying to anticipate your question.

19 Q That's a dangerous game.

20 A Apologies.

21 Q It appears it is listed as page 26.

22 A Okay.

23 Q So this one.

24 A Got it.

25 Q Okay. It says Religious Services.

1 Do you see that?

2 A Yes.

3 Q Okay. And then if you look down below,
4 there's a list of all the various services present
5 throughout the case, correct?

6 A Yes. What year was this?

7 Q This was 1966.

8 A Okay. I'm sorry. I just saw that.

9 Q Okay. That's a little more repetitive, but
10 it does break it down by the chapel. You see where
11 it says Protestant Base Chapel. Below that, Base
12 Sunday School. Below that Geiger Chapel. Correct?

13 A Correct.

14 Q There's also an MCAF Chapel, correct?

15 A Yes.

16 Q And Midway Park Community Building,
17 correct?

18 A Yes.

19 Q And Montford Point Chapel?

20 A Yes.

21 Q Tarawa Terrace School?

22 A Yes.

23 Q Catholic service in Midway Park?

24 A Uh-huh.

25 Q Base Chapel again for St. Francis Xavier

1 Chapel?

2 A Yes.

3 Q And then additional services, repeats, Camp
4 Geiger Chapel, Courthouse Bay Chapel, MCAF Chapel,
5 Tarawa Terrace Community Building.

6 Is it fair to say that there are chapels --

7 A Yes.

8 Q -- spread throughout the various areas of
9 Camp Lejeune?

10 A Yeah.

11 Q It appears that they tried to have a mix of
12 services at different chapels throughout the base,
13 correct?

14 A It does appear that way. Some of them are
15 not identified, like the LDS --

16 Q Correct.

17 A -- where Building 67 is. They allow for
18 the use of a church or a chapel.

19 Q Okay.

20 A But, again, I think being on Camp Lejeune,
21 there's definitely a noticeable difference between
22 the quality of the chapels at Hadnot Point as
23 opposed -- they look like what you would see at an
24 academy.

25 Q Right.

1 A But there's no denying there were outside
2 areas.

3 Again, it would be good to have the numbers
4 on these.

5 Q Right.

6 A You know, you could have had a community --
7 Sunday school at Midway Park Community Building for
8 10, 15, versus hundreds.

9 So it is hard to determine, but in terms of
10 facilities, it is pretty easy. Plus the main
11 chaplains were all stationed at Hadnot Point.

12 Q Okay.

13 A As well as the main priest.

14 Q Moving forward a few pages, you will see
15 this page lists libraries at the top?

16 A Yes.

17 Q Page 32 on the bottom.

18 A Yes. Got it.

19 Q I just want to confirm that there are
20 libraries at Montford Point --

21 A Uh-huh.

22 Q -- Courthouse Bay, and Rifle Range,
23 correct?

24 A Right.

25 Q And that's in addition to the Main Area D

1 library that's at Hadnot Point, correct?

2 A Right. But if you notice also and look at
3 the number of hours, and compare and contrast.

4 Q Correct.

5 A Significantly more. Plus here would be
6 another good one for a central library, and it is
7 saying it has a collection of over 30,000 titles.
8 It doesn't list that for these others. And, again,
9 their hours are more limited.

10 Q Okay.

11 A I would just point out, compare and
12 contrast the quality of the pools and of the gym
13 which would hold 4,000 and then look at the outlying
14 areas and try to find anything comparable.

15 Q Uh-huh.

16 A It is not going to happen.

17 Q Okay. Then moving to page 39.

18 A Got it.

19 Q I guess it is 38, there's no page number.
20 Under Recreation --

21 A Uh-huh.

22 Q -- it lists archery, boating, bowling,
23 camping trailers, correct?

24 A Yes.

25 Q Then moving over to 39 it says Recreation

1 Centers.

2 A I would just go back and point out, just,
3 for example, under Recreation, if you look under
4 Bowling, the Bonnyman Bowling Center, located behind
5 the main exchange in Building 69 -- or 89, I'm
6 sorry, includes 32 -- I said earlier in the day I
7 thought it was only like 12 or 15 -- 32 automatic
8 lanes.

9 Q Uh-huh.

10 A That's a big bowling alley.

11 Q Right.

12 A And that's on Hadnot Point.

13 Q Correct.

14 A As are the golf courses.

15 Q And then going to --

16 A Back to Paradise Point.

17 Q -- page 39, Recreation Centers, it begins:

18 "There are seven located throughout the
19 base. Two at Camp Geiger, along with a bowling
20 alley, and one" --

21 It goes on to the next page.

22 A Uh-huh.

23 Q -- "at the Industrial Area, Central Area,
24 Montford Point, Rifle Range, and Courthouse Bay."

25 Did I read that correctly?

1 A Yes.

2 Q Obviously, the one at Hadnot Point would be
3 the largest.

4 A Yeah. Thirty-two lanes. I doubt these
5 others were even anywhere close.

6 Q Okay.

7 A I mean, the Rifle Range didn't attract that
8 many people. The Courthouse Bay, if we look in
9 terms of population, is significantly smaller.

10 Q Continuing on page 40, Youth/Community
11 Activities and Facilities, there's additional ones
12 listed for Marston Pavilion, which is between Hadnot
13 Point and Holcomb Boulevard; the Geiger Trailer Park
14 Community Center; Knox Trailer Park Community
15 Center; Midway Park Community Center, and Tarawa
16 Terrace Community Center, correct?

17 A Correct.

18 Q Okay. I won't belabor the point anymore, I
19 think we made it, but Hadnot Point had probably the
20 largest facilities, but there were facilities
21 scattered --

22 A Right.

23 Q -- throughout the base, correct?

24 A I will not argue that point.

25 Q Okay. Great.

1 A But, again, I think the -- again, 32
2 bowling lanes versus five or six are -- you know,
3 the other thing about, like, the bowling alley, from
4 what I understand, from what I've heard, is, again,
5 that's a place where you could go get beer served.
6 I mean, it was more than just a bowling alley.

7 Q Right.

8 A It was the center point of the community to
9 gather.

10 MR. GIBBONS: Okay. Let's go ahead and
11 take a break.

12 THE WITNESS: Okay.

13 MR. GIBBONS: We have been on the record
14 for an hour and a half.

15 MR. HUGHES: This is the end of Media File
16 Number 5. We are now going off the record. The
17 time is 4:15 p.m.

18 (Recess taken.)

19 VIDEO OPERATOR KELLEY: This is the
20 beginning of Media File Number 6. We are now going
21 on the record. The time is 4:32 p.m.

22 BY MR. GIBBONS:

23 Q Okay. Dr. Longley, before we took our
24 break, we were still working through your first
25 report from December 7th. If you can turn back to

1 page 3 of your report.

2 I think we have exhausted opinion 4. We
3 will move on to Opinion 5.

4 A Uh-huh.

5 Q "Certain particular features,
6 such as shower rooms in the barracks,
7 motor pools and mechanic buildings,
8 and scullery and mess hall facilities,
9 are correlated to considerable
10 anecdotal reported evidence of the
11 presence of steam and copious water
12 use during the historical time period
13 at issue."

14 Did I read that correctly?

15 A Yes.

16 Q Okay. And what facts and data did you
17 consider in forming that opinion?

18 A Combination of examining, like, building
19 schematics. Looking at some of the information, if
20 you look here on page 17, the Marine Corps produced
21 its own water conservation analysis and provided
22 some information.

23 Oral history, the depositions from Howard
24 McElhiney, and I may not be -- McElihiney or
25 "hieney" --

1 Q McElhiney.

2 A McElhiney. So a combination of factors.
3 The Globe providing, you know, pictures of, like,
4 the lining up for serving line. So it was a variety
5 of factors --

6 Q Okay.

7 A -- or a variety of sources.

8 Q Okay. Are you a water-modeling expert?

9 A No. Do not claim to be.

10 Q Okay.

11 A It was just to make the point that there
12 was this access or these people were exposed,
13 depending on their positions, to steam, whether it
14 be in the kitchens, whether it be in the auto areas
15 where they did steam cleaning, those kind of things.

16 Q Okay.

17 A No claim to have that kind of specialized
18 training.

19 Q Okay. And when you said "oral history"
20 earlier, are you still using the term broadly?

21 A Right.

22 Q As depositions --

23 A Yeah.

24 Q -- declarations?

25 A Yeah.

1 Q I'm sorry, I don't think we covered that
2 earlier. Do you consider written declarations by
3 the plaintiffs to be oral histories?

4 A No.

5 Q Okay.

6 A Those are more like public statements.

7 Q Okay.

8 A Those would be more like a diary entry or a
9 letter, a primary document like that.

10 Q Okay.

11 A That's what I would compare them more
12 toward.

13 Q Okay. If had to rank them in terms of
14 veracity relative to a full-blown oral history
15 interview -- sorry, I shouldn't be gesturing.

16 A That's all right.

17 Q Full-blown oral history, interview,
18 declaration, deposition, how would those stack?
19 Like, how do you rank those in terms of what you
20 consider to be the most accurate or most exhaustive
21 versus the least exhaustive?

22 A There's many factors to determine there.

23 Q Okay.

24 A When they were done. We know the further
25 we get away from it, the less -- away in time from

1 it, there sometimes could be discrepancies there as
2 a result. So you waive that.

3 You know, for example, if you were going to
4 give me a good choice of materials that I would want
5 to see, I would want to see a letter from
6 Mr. Enslinger to his wife describing something
7 written in a particular time almost immediate. But
8 even there I would be careful. Because I've used
9 this in Grunts and Morenci Marines and now The
10 Forever Soldiers, soldiers oftentimes edit
11 themselves depending who their audience is. So, you
12 know, diaries are oftentimes good. There's not one
13 that I rank above the others without knowing some
14 other factors too.

15 Q Okay. Generally assuming -- I know this is
16 difficult. All the factors would be equal, all of
17 them under ideal conditions --

18 A Uh-huh.

19 Q -- how would you prioritize them or rank
20 them?

21 A Give them to me again, sorry. The ones
22 that you wanted ranked.

23 Q I would say formal oral histories, the
24 recorded transcribed ones.

25 A Right.

1 Q Depositions. Written declarations.
2 Letters. Unrecorded statements. Things of that
3 nature.

4 A Right. I think letters would always be at
5 the top. Again, depending on when it was written
6 and to what audience.

7 Q Okay.

8 A You know, for example, in Vietnam we know
9 soldiers would tell their parents -- sanitize it
10 pretty good. They might tell a brother or they
11 might tell a fellow veteran very different things
12 than what they would tell mom or dad or their
13 girlfriends or their wives. So letters are
14 always -- if I had to say, that's my first choice,
15 because they are written in the immediate, but,
16 again, I understand there's limitations there.

17 Probably -- court documents and depositions
18 I think are very important because of the -- you are
19 doing it under oath, and I think more people -- now,
20 I'm not asking the questions, so I'm maybe not able
21 to direct it in the -- ask the questions the way I
22 would like to.

23 Then I would put oral history. Again, when
24 I see oral history, it is a lot of times filling in
25 the gaps. Humanizing the story. Because too often

1 it can get dry and statistical, and history,
2 especially a story like this, has to be humanized.

3 And then finally probably the declarations.
4 But, again, I would have to weigh considerations on
5 who made the declaration, why they made it, and when
6 they made it.

7 Q That's very interesting.

8 So you would put deposition testimony on a
9 higher tier than the formalized oral recorded
10 history?

11 A It would be a close battle.

12 Q Okay.

13 A But, again, I think coming under oath
14 changes some of the dynamics. I don't, you know,
15 ask somebody to speak on their oral histories
16 because they could -- so they could exaggerate.
17 They wouldn't even be maybe cognizant of it, but I
18 think the depositions, you are zeroed in because you
19 do fear, you know, the punishment that comes with
20 perjury. Perjury is like the equivalent of
21 plagiarism in academia. It is a very different
22 beast than someone just told a big one.

23 Q Doesn't that contradict your statement
24 earlier when you were describing Mr. Howard as not
25 necessarily sophisticated enough to appreciate

1 making inconsistent statements between his
2 deposition and your interview?

3 A Could you rephrase that?

4 Q Sure.

5 When we were talking about your interview
6 with Mr. Howard --

7 A Uh-huh.

8 Q -- earlier, I said did you think there was
9 a concern about it being recorded because he was
10 worried he would say something inconsistent with his
11 deposition which was under oath --

12 A Right.

13 Q -- subject to perjury.

14 A I think that could have an effect.

15 Q Okay.

16 A I do not deny that that could have an
17 effect, I don't think that's probably what was the
18 driving force. Again, when I've done oral
19 histories, like I say, I've learned that they're --
20 again, if it is someone that's used to be being
21 interviewed, they know how to handle themselves,
22 they are comfortable in many ways. Someone who has
23 never been interviewed or they don't know you, they
24 don't have necessarily the trust in you yet, then I
25 think there's multiple levels. I don't think he was

1 thinking that.

2 Q Okay.

3 A I don't think that was the motivating
4 factor where I was more careful.

5 Q Okay.

6 A And that wasn't my intent either.

7 Q Do you think that people might be more
8 conservative in their statements in depositions
9 because of the penalty of perjury?

10 A I think so.

11 Q Okay. Do you think that has any sort of
12 deleterious effect on the testimony that is elicited
13 in deposition versus an open-ended oral history?

14 A I think it can be a combination that when
15 you blend the two and see where they cross, I think
16 they can be complementary.

17 Q Okay.

18 A Only I don't think they are mutually
19 exclusive. They are complementary.

20 Q Okay. Sorry, I know we went a little far
21 afield with Opinion 5.

22 A No.

23 Q Now Opinion 6:

24 "Historical records and
25 recollections of Marines' daily tasks,

1 activities, and duties reflect the
2 presence of numerous outdoor
3 activities during warm and hot weather
4 periods, the use of canteens and
5 wheeled water tanks known as water
6 buffaloes, and other such facts.
7 Likewise, historical records document
8 daily life and social activities of
9 spouses, children, and civilians that
10 involved, for instance, spending time
11 at base-located schools that used base
12 water systems, using recreational
13 swimming pools that use base water
14 systems, and engaging in activities
15 like socializing at clubs, bowling,
16 going to movies, going to buy
17 necessities at the commissary
18 facilities, using medical facilities,
19 and so forth, which gave rise to
20 opportunities for water use."

21 Did I read that correctly?

22 A You did.

23 Q Okay. But as we talked about earlier, I
24 went slightly out of order, there were facilities
25 that provided all of these opportunities throughout

1 the base, the largest of which -- most sophisticated
2 which were at Hadnot Point?

3 A Hadnot Point. If you look at, like, the
4 swimming pool at Tarawa Terrace, it seemed they were
5 almost sort of the order, although that changed over
6 time. Again, New River ultimately started receiving
7 a lot of the best facilities over time.

8 But, yeah, primarily Hadnot Point is where
9 the gathering place was for a lot of the baseball,
10 you know, T-ball, things like that even. More
11 likely Little League up into Pony League and there.

12 Yeah, there were outside areas where this
13 could happen, but, again, it is all to scale.

14 Q Understood.

15 A Yeah. Again, you are not going to get a
16 gym for 4,000 people at New River or Courthouse Bay.
17 That's going to be at Hadnot Point.

18 Q Okay.

19 A Theaters, same way.

20 Q There were some activities that couldn't
21 have occurred at Hadnot Point though, correct?
22 Like, say, observing amphibious land use, right?

23 A Right.

24 Q That would have had to be at Onslow Beach,
25 right?

1 A Yeah. But most likely there would have
2 been a parade before that. Like when John Kennedy
3 visited in 1962 -- '61, we have got in there most
4 recent. You would have probably been greeted there.
5 That's where the parade would have occurred, then it
6 would have moved out to Onslow Beach.

7 Q Gotcha.

8 A Again, that's where the main administrative
9 buildings were. That's, again, the center point.

10 Q The photo of Kennedy that you talked
11 about --

12 A Uh-huh.

13 Q -- do you have anything suggesting that
14 there was, like, a parade or anything at Hadnot
15 Point?

16 A I haven't found that, no.

17 Q Okay.

18 A No. But we know he was on base.

19 Q Okay.

20 A Yeah. Same with Reagan. Reagan came
21 there. I don't know what all was planned, but then
22 he went out to the -- I forget where the Lebanon
23 bombing memorial is.

24 Q Okay.

25 A But I can't -- I don't have that itinerary.

1 I could probably track that down at the Kennedy
2 Library or the Reagan Library.

3 Q Okay. I forgot because you were the
4 director of the Johnson Presidential Library, right?

5 A Yeah. And they usually had dated logs,
6 although I don't know for each individual president.

7 Q Okay.

8 A I'll just say a high probability that they
9 had some kind of event to honor the president before
10 they went out to -- and especially since his
11 compatriot was the Shah of Iran.

12 Q Right.

13 That reminds, me, though, I want to skip
14 ahead to something in your March 17th, 2025, report,
15 which I believe is Exhibit 5.

16 A Okay. Got it.

17 Q Bear with me for one minute.

18 Okay. It is on page 34 of your report
19 where the photo of Kennedy appears.

20 A Uh-huh.

21 Q Can you talk about how in the middle of the
22 paragraph it says:

23 "Further, the mere fact that
24 President Nixon did not visit the base
25 does not diminish the fact that other

1 presidents did visit the base,
2 including during the statutory period,
3 including President Kennedy in 1962
4 with the Shah of Iran, (he also
5 visited Camp Bogue and President
6 Reagan in 1983) and later outside of
7 the 1950s to 1980s, Bill Clinton,
8 George W. Bush, Barack Obama, Franklin
9 Roosevelt before and during World War
10 II."

11 Correct?

12 A Correct.

13 Q And the photos of President Kennedy came
14 from the Daily News, correct?

15 A Yes.

16 Q Okay. And your position is that these
17 always drew people to Hadnot Point?

18 A Not necessarily.

19 Q Okay.

20 A Highly probable that there was an event
21 there for the presidents. Again, the main parade
22 ground is there.

23 Q Okay.

24 A And Marines love a good parade, you know.
25 Pass and review.

1 So, no. I don't claim to know absolutely
2 sure what the itinerary is. That could be
3 determined, though, by going to the daily records of
4 the president, which should be available at the
5 Kennedy Library or the Reagan Library.

6 Q Okay. But you would agree that it is
7 possible for the president's presence to draw crowds
8 to other areas of Camp Lejeune as well, correct?

9 A Yes.

10 (The document referenced below
11 was marked Deposition Exhibit 15 for
12 identification and is appended
13 hereto.)

14 BY MR. GIBBONS:

15 Q For instance, in the Jacksonville Daily
16 News article in which the photos appear -- which
17 I'll introduce as Exhibit 15.

18 If you look under the photo the caption
19 reads:

20 "President John F. Kennedy
21 (center wearing sunglasses), Mohammad
22 Reza Pahlavi" --

23 A Pahlavi.

24 Q -- "Pahlavi, Shahanshah of
25 Iran (left of President Kennedy), and

1 other distinguished guests watch a
2 demonstration of the U.S. Navy and
3 Marine Corps amphibious landing
4 Riseley Pier, Camp Lejeune, North
5 Carolina."

6 Did I read that correctly?

7 A Yes.

8 Q So, for instance, in this case, President
9 Kennedy was drawing the crowds to Onslow Beach,
10 which would have been away from Hadnot Point,
11 correct?

12 A Could possibly be. I mean, it is in this
13 case.

14 Q Okay.

15 A Again, is to witness, and we acknowledge
16 this, that's what he is there is to watch the
17 amphibious landings.

18 Q Okay. But did you acknowledge that in your
19 report?

20 A I thought I did. If I didn't, it can be
21 easily changed to do so.

22 Q Because my concern is it gives the context
23 that the presidents drew crowds to Camp Lejeune's
24 Hadnot Point area every time, which I agree the
25 explanation you gave, that they would usually have

1 parades ahead of time might have made clear, but I
2 didn't see that here, and it may be a concern.

3 A Okay. That's something, again, I can go
4 back and doublecheck.

5 Q Okay.

6 A And go to the Kennedy Library, and I'll see
7 if it is open today. They have been closed several
8 times already due to the government shutdowns and
9 threats of loss of government employees.

10 Q Okay. All right. Put this away for right
11 now. Okay. We are going to turn back to Exhibit 4,
12 which is January 13th report.

13 Could you go to page 25?

14 A Just a second. I've got so much in front
15 of me now. Which report was that?

16 Q The second report, January 13th, 2025.

17 A You are saying 5 or 4.

18 Q 25. Oh, sorry, Exhibit 4.

19 A Okay. Page 25?

20 Q Correct.

21 A Okay.

22 Q Okay. I'm going to give you a minute to
23 review the last two paragraphs on 25.

24 A I remember these.

25 Q Okay.

1 A Okay.

2 Q There weren't stated opinions at the
3 beginning of this report, but did these two
4 paragraphs basically summarize your conclusions and
5 opinions that are contained within the January 13th
6 report?

7 A Yes.

8 Q Okay.

9 A Again, this is one I didn't make a great
10 deal of -- I know the Brigham report spent a lot of
11 time on this. I didn't see the issue to the same
12 degree I think as Dr. Brigham did.

13 Q Which issue is that?

14 A The issue that this was an important issue
15 for when the ABC Cleaners opened, whether it was '53
16 or '54. I didn't spend one paragraph on them --

17 Q Understood.

18 A -- versus his probably 10, 12 pages on it.

19 Q Understood.

20 In your opinion, does the number of sources
21 that contradict Mr. Melts' deposition testimony give
22 you any reason to question the accuracy of the 1953
23 opening start date?

24 A I think there's some concern mainly because
25 I don't know who put the direct -- or the

1 advertising together. I don't know. High school
2 annual, 18-year-olds shouldn't be put in control of
3 anything for the most part, so. I think -- but,
4 again, this is not a hill I want to try to make a
5 stand on.

6 Q Okay.

7 A This is one that I'm going to let the
8 scientists figure this out whether it really matters
9 whether it was '53 or '54.

10 Q Okay.

11 A So I'm not -- like I say, this is one that
12 I didn't think -- as you can tell just by the sheer
13 volume, I've written 25 pages and one paragraph on
14 this.

15 Q Okay.

16 A So I won't contend one way or the other.
17 And, again, I'm not a scientist to be able to know
18 if it made a difference.

19 Q Okay. And I just want to draw your
20 attention down to fifth line down begins:

21 "Second, the researchers like
22 Mike Partain (see The Few, The Proud
23 timeline dated 2012)" --

24 I'm sorry.

25 "Second, the Melts deposition,

1 cited in the timeline, reflects that
2 the owner Mr. Melts' testimony that
3 put the opening date in 1953. This
4 evidence refutes Brigham's arguments
5 for 15954. More specifically,
6 throughout his deposition, Mr. Melts'
7 testimony confirmed that ABC Cleaners
8 began operation in 1953 at 2127
9 Lejeune Boulevard and operated in the
10 same location ever since he opened it
11 in 1953; that he worked it with his
12 brother, who also worked in the
13 business prior to his death; that he
14 obtained the PCE chemical and used it
15 ever since he began operations in
16 1953; and that, as far as he knew, it
17 was not diluted but 100 percent pure
18 PCE."

19 Did I read that correctly?

20 A Yes.

21 Q Okay. And I just want to make sure I
22 understood.

23 So what you are saying is you're not
24 necessarily inherently disagreeing with Dr. Brigham
25 that there is cause for concern about the 1953 start

1 date versus 1954?

2 A No.

3 Q Okay.

4 A Again, my fundamental question is I'll let
5 the scientists determine whether it matters '53 or
6 '54.

7 Q Okay.

8 A Yeah, that is not one -- like I say, as I
9 note, I only spent a paragraph on.

10 Q Okay.

11 A Even -- in a comparative sense to
12 Dr. Brigham's how much he spends, 24 to 33, excuse
13 me.

14 Q Okay.

15 A But I'm not contesting that. You got
16 Mr. Melts on one side, and then you have got these
17 other materials on the other.

18 If I remember right, this was the Yellow
19 Pages.

20 Q Correct.

21 A Yeah.

22 Q In Dr. Brigham's report.

23 A Right.

24 Q Generally speaking, your January 13 report
25 talks a lot about Mike Partain's timeline found on

1 "The Few, The Proud, The Forgotten."

2 A Uh-huh.

3 Q Correct?

4 A Yes.

5 Q Okay. And on page 5 you wrote, second
6 paragraph:

7 "In short, it appears the Partain
8 website provides a fair representation
9 of the state of the general historical
10 knowledge on the Camp Lejeune water
11 contamination issues as of 2012."

12 A Uh-huh.

13 Q Did I read that correctly?

14 A Yes.

15 Q Okay. Skipping ahead to page 9, there's a
16 lot of talk about "The Few, The Proud, The
17 Forgotten" in between. Top of page 9 begins:

18 "Yet even though the government
19 VA used the Partain website to provide
20 relevant historical background for VA
21 experts, the Brigham report fails to
22 cite it."

23 Did I read that correctly?

24 A Yes.

25 Q "The facts regarding Partain website

1 therefore help to highlight how the Brigham report
2 relies on selected information."

3 Did I read that correctly?

4 A Yes.

5 Q Okay.

6 (The document referenced below
7 was marked Deposition Exhibit 16 for
8 identification and is appended
9 hereto.)

10 BY MR. GIBBONS:

11 Q I'm going to introduce Exhibit 16.

12 Doctor Dr. Longley, do you recognize
13 Exhibit 16?

14 A Yes. I've seen it on the website.

15 Q What is it?

16 A It is from the website. It is the
17 chronology.

18 Q Okay. This is the timeline prepared by
19 Michael Partain, correct?

20 A Yes.

21 Q This is the one that you're stating that
22 Dr. Brigham did not rely on, correct?

23 A To my knowledge, he had not relied on it.

24 Q Okay. I'll direct your attention to the
25 Bates number in the bottom right-hand corner,

1 CLJA_Healtheffects-0000053576.

2 A I'm sorry, I'm missing what you are
3 referencing.

4 Q I'm sorry, the exhibit number might be
5 covering it. The Bates number in the bottom
6 right --

7 A Okay. All right.

8 Q -- which would indicate this is a document
9 produced in this litigation, correct?

10 A Yes.

11 Q Okay. Did you review Dr. Brigham's
12 reliance materials for this December 9th report?

13 A I thought I did, yes.

14 Q Okay.

15 A This one.

16 Q I would represent to you that if you had
17 reviewed his reliance materials, you would have
18 noticed that this Bates number is among the reliance
19 materials that he and his team cited.

20 A And I can see why it would be easy to miss.

21 Q Understandably, so.

22 A Yeah, that's --

23 Q Does that change your opinion of Brigham's
24 report knowing that he did in fact review "The Few,
25 The Proud, The Forgotten" website?

1 A No, because I think his overall conclusions
2 would remain the same.

3 Q Okay. In what way?

4 A I give other examples of the incomplete
5 information of skipping some -- you know, if you go
6 back to the -- I think the final page on --

7 "In conclusion, I would say the
8 Brigham report does have some good
9 historical sections such as those
10 regarding the original building of the
11 camp. However, the majority of the
12 report lacks some of the primary" --
13 or "lacks primary research, especially
14 use of first-person accounts and
15 ignores important sources such as
16 Command Chronologies, The Globe, and
17 back issues of the Leatherneck."

18 Did he use them? Yes. Did he use them in
19 the fullest extent? No.

20 Q Okay.

21 A So I don't think this missing the -- you
22 know, the number of CLJA number really has an
23 effect.

24 Q Okay. But that would mean that he had
25 reviewed the materials, correct?

1 A According to his reliance list.

2 MR. HUGHES: Objection. Vagueness. I'm
3 not -- what -- Longley's report says the Brigham
4 report fails to cite it, and that might be distinct
5 from -- citing it to me means citing in a footnote
6 or something versus -- sounds like what you are
7 saying it is in his reliance materials. I'm not
8 sure if that's the same thing as him citing it.

9 MR. GIBBONS: Okay. Fair enough.

10 MR. HUGHES: But I get your point that it
11 is in his reliance.

12 MR. GIBBONS: I'm going to request you
13 object purely to form --

14 MR. HUGHES: I understand.

15 MR. GIBBONS: -- and refrain from further
16 speaking objections.

17 MR. HUGHES: Yes.

18 MR. GIBBONS: Thank you.

19 BY MR. GIBBONS:

20 Q Moving down to the bottom of page 9 you
21 have the map from the ATSDR report which Dr. Brigham
22 used in page 11 of his report, stated:

23 "This image, culled from ATSDR
24 publications, has conspicuously less
25 information than other ATSDR maps and

1 images that Brigham omits. This fact
2 is seen by comparing the image above
3 to the more detailed image below."

4 And then there's another map from the
5 ATSDR.

6 Did I read that correctly?

7 A Yes.

8 Q Would you agree that the text is more
9 legible in the map that's present on page 9 of your
10 report versus the map that's on page 10 of your
11 report?

12 A Yes.

13 Q Do you think that might have factored in to
14 Dr. Brigham's reason for using that map?

15 A I can't ascertain what his reasoning was.

16 Q Okay.

17 A Only he can do that.

18 Q Okay. Apart from the contamination plumes,
19 is the map on page 9 an accurate representation of
20 the water systems that Dr. Brigham was discussing in
21 his report?

22 A I'd have to go back and look at it in
23 greater detail. Again, I need a little better
24 magnifying glass.

25 Q Okay. Would you agree that the map that's

1 present on page 9 of your report is less visually
2 complex than the map that's present on page 10 of
3 your report?

4 A Much less complex.

5 Q Okay. Would you agree that the map that's
6 present on page 9 of your report includes all the
7 wells within the Tarawa Terrace, Hadnot Point, and
8 Holcomb Boulevard locations?

9 A I would have to go back and compare and
10 contrast.

11 Q Okay. I think going to page 2 in your
12 report.

13 A On this same -- same report?

14 Q Same report. The January 13th report.
15 Okay. Beginning. Second paragraph, you
16 said:

17 "It is not clear that the Brigham
18 report author spent time aboard the
19 base. A personal tour of the base
20 helps gain an understanding of issues
21 such as distances between different
22 parts of the base and where the key
23 facilities and landmarks fall."

24 Did I read that correctly?

25 A Yes.

1 Q Okay.

2 (The document referenced below
3 was marked Deposition Exhibit 17 for
4 identification and is appended
5 hereto.)

6 MR. GIBBONS: Okay. I'm going to introduce
7 Exhibit 17.

8 BY MR. GIBBONS:

9 Q Doctor, do you recognize Exhibit 17?

10 A Yes.

11 Q What is it?

12 A It is the initial report of Brigham.

13 Q Okay. And this report was issued
14 December 9th, 2024, correct?

15 A Yes.

16 Q This is the report that you are referring
17 to in your January 13th report, correct?

18 A Yes.

19 Q Okay. If you will turn to page 1, which I
20 believe is also the third page in the exhibit.

21 In the second paragraph, approximately
22 seven lines from the bottom, begins, "I also visited
23 the Harriotte B. Smith Library at Marine Corps base
24 Camp Lejeune."

25 Did I read that correctly?

1 A Yes.

2 Q That would indicate that Dr. Brigham was in
3 fact on Camp Lejeune prior to the August 3rd report,
4 correct?

5 A Yes. And also he followed that up with his
6 rebuttal.

7 Q Okay.

8 A What I said was, though, it didn't appear.

9 Q Okay.

10 A I didn't say he wasn't. I said it did not
11 appear that he understood or is not clear.

12 Q Okay. But you did read this report in its
13 entirety, correct?

14 A Yes.

15 Q Okay. Minor -- or say acknowledge his one
16 sentence?

17 A Yeah, no.

18 Q Do you believe that Dr. Brigham's visit to
19 Camp Lejeune would have provided him insight based
20 on the description that appeared in his second
21 report?

22 A Yes.

23 Q Okay.

24 A Again, I acknowledge the second report had
25 more of a definition of that, that he spent time

1 there.

2 Q Okay. On page 1 of your January 13 report
3 second paragraph from the bottom, you said that:

4 "The report" -- Dr. Brigham's
5 report -- "also fails to account for
6 information indicating that water
7 buffaloes routinely picked up water
8 from the Hadnot Point industrial area
9 and took it all over the base, and
10 even off base, and other information
11 on water buffaloes."

12 Did I read that correctly?

13 A Yes.

14 Q Then going back to Exhibit 17,
15 Dr. Brigham's report, page 2, Opinion 4.

16 A What page?

17 Q Page 2.

18 A Okay.

19 Q Opinion 4. It states:

20 "Extant documentation reveals
21 that the Marine Corps used water
22 trailers to supply water for field
23 training (otherwise known as water
24 buffaloes or water bulls) at
25 Camp Lejeune during the statutory

1 period. All the water treatment
2 plants at Camp Lejeune had the
3 infrastructure to support the
4 installation of standpipes used to
5 fill water trailers in their
6 respective areas. Travel times
7 between Hadnot Point and other areas,
8 including those west of New River,
9 subject further reason to construct
10 standpipes in those areas."

11 Did I read that correctly?

12 A Yes.

13 Q Did anything in that statement preclude the
14 potential of filling of water buffaloes at Hadnot
15 Point?

16 A No.

17 Q Okay. If you will turn to page 104 of his
18 report.

19 A Got it.

20 Q Okay. And there's an image that's labeled
21 "Standpoint at Building 1400 at Hadnot Point.
22 December 12, 1975."

23 A Uh-huh.

24 Q It is footnoted for The Globe article,
25 correct?

1 A Yes.

2 Q Okay. And below it, it states:

3 "All of the water treatment
4 plants at Camp Lejeune had the
5 infrastructure to support their
6 installation of standpipes in the
7 respective areas including Hadnot
8 Point, Camp Geiger, Camp
9 Johnson/Montford Point, MCAS, Rifle
10 Range, Courthouse Bay, and Onslow
11 Beach."

12 Did I read that correctly, yes or no?

13 A Yes.

14 Q "The travel times from
15 Hadnot Point to other places on
16 Camp Lejeune proximate to training
17 activities would present significant
18 problems to be overcome and the
19 permanency of the installation would
20 be further reason to construct
21 standpipes in areas closer to training
22 facilities than Hadnot Point."

23 Did I read that correctly?

24 A Yes.

25 Q Did anything in that statement preclude the

1 possibility of filling water buffaloes at Hadnot
2 Point?

3 A No.

4 Q Okay.

5 A I would add the problem is, just like I
6 said earlier, if you are going to make these kind of
7 comments, support them.

8 Q Okay.

9 A Show that there were these standpipes,
10 especially the size and the structure built at these
11 outlying areas. I think that's a point that I would
12 make on that.

13 Q Okay. Let's talk about that.

14 We will move to your March 17th report.

15 (The document referenced below
16 was marked Deposition Exhibit 18 for
17 identification and is appended
18 hereto.)

19 BY MR. GIBBONS:

20 Q I'm going to introduce Exhibit 18.

21 Dr. Longley, do you recognize what
22 Exhibit 18 is?

23 A Yes.

24 Q Okay. What is it?

25 A It's the rebuttal, if I'm not mistaken.

1 Q Okay. Which rebuttal report?

2 A To my first report.

3 Q And this is the rebuttal by Dr. Brigham,
4 correct?

5 A Yes, correct.

6 Q Okay. Sorry for the flip-flop.
7 Back to Exhibit 5, your March 17th, 2025,
8 report.

9 A Okay.

10 Q Go to page 30.

11 A Of my report?

12 Q Of your report, correct.

13 You stated on the third full paragraph:

14 "Dr. Brigham echoes Dr. Kelman
15 stating, 'I do not consider deposition
16 testimony or depositions to be oral
17 history. First, this criticism is
18 limited by the fact that where it
19 serves his cause, Dr. Brigham himself
20 cites deposition testimony. (Brigham
21 February 7th, 2025 report, page 2,
22 citing Zinni McElhiney, Urquhart
23 testimony), 33 to 35 (same); and see
24 Brigham December 9th, 2024, report,
25 page 26 (citing Melts deposition), 28

1 number 84 (same.)"

2 Did I read that correctly?

3 A Yes --

4 Q Okay. So Dr. Brigham cited General Zinni
5 McElhiney, and Urquhart's testimony, correct?

6 A Correct.

7 Q In their depositions?

8 Do you remember the reason in which he
9 cited those depositions?

10 A If I'm not mistaken, to contradict my
11 statements.

12 Q Do you remember the substance of what those
13 contradictions were?

14 A I don't off the top of my head.

15 Q Okay. Okay.

16 We can flip to Exhibit 18 the February 7th
17 report of Dr. Brigham.

18 On page 2 in Opinion 5, towards the
19 bottom -- sorry, towards the middle of the
20 paragraph, it says:

21 "In fact, although Dr. Longley,
22 in other parts of his report, cites
23 certain portions of General Anthony
24 Zinni's deposition... He fails to cite
25 the part of General Zinni's testimony

1 that notes there was a water buffalo
2 filling station at Camp Geiger."

3 Did I read that correctly?

4 A Yes.

5 Q "And although Dr. Longley
6 cites Plaintiff Gary McElhiney, Sr.'s
7 deposition in his report, he does not
8 reference Mr. McElhiney's statement
9 that a water-filling station was
10 located at Courthouse Bay."

11 Did I read that correctly?

12 A Yes.

13 Q "Similarly when Dr. Longley
14 selectively cites to Plaintiff
15 Benjamin Urquhart's deposition, he
16 fails to include Mr. Urquhart's
17 testimony that there were
18 water-buffalo-filling stations in
19 numerous locations on the base."

20 Did I read that correctly?

21 A Yes.

22 Q Okay. Did that refresh your recollection
23 of Dr. Brigham's use of the deposition testimony?

24 A Yes.

25 Q Okay. So I believe you stated that

1 Dr. Brigham did not adequately explain that water
2 buffaloes could be filled at other locations other
3 than Hadnot Point. Is that correct?

4 A I don't think that's correct.

5 Q In his December 9th report.

6 A Oh, okay.

7 Q Okay. But he did acknowledge this in his
8 rebuttal report, correct?

9 A Yes.

10 Q But do you believe that he considered any
11 materials that might have not made it into his
12 report?

13 A I don't know that.

14 Q Okay. Is it possible he considered
15 materials that did not make it into the direct
16 citations in his report?

17 A Only he could answer that.

18 Q Okay. Is it possible?

19 A Again, only he can answer that.

20 Q Okay. Did you have sources that you did
21 not directly cite in your reports?

22 A Yes.

23 Q Okay. And additional sources that may not
24 have been in your reliance materials, correct?

25 A Yes.

1 Q Okay. Could the same be true of
2 Dr. Brigham?

3 A It could be same.

4 Q Okay.

5 (The document referenced below
6 was marked Deposition Exhibit 19 for
7 identification and is appended
8 hereto.)

9 BY MR. GIBBONS:

10 Q Okay, introduce Exhibit 19. Dr. Longley,
11 do you recognize this document?

12 A Yes.

13 Q Okay. What is it?

14 A It is a deposition, part 1, Gary McElhiney,
15 or "liney," of March 5th, 2024.

16 Q Okay. Excuse me for one moment. I believe
17 I mislabeled an exhibit.

18 Okay. Please turn to page 55 of the
19 deposition. It is a quad chart, so the page will
20 appear in the upper right corner of the quad chart.

21 A Got it.

22 Q Okay. Beginning on line 6.

23 "Question: Do you know what type
24 of use these water tanks -- or what
25 these water tanks were used for?

1 "Answer: Potable water.

2 "Question: And do you know where
3 they would transport water from and
4 to, generally speaking?

5 "Answer: Yes. You'd transport
6 the water from water points to their
7 destinations out in the field for
8 water for the troops, chow halls,
9 showers.

10 "Question: Okay. And were these
11 water tanks used at Camp Lejeune?

12 "Answer: Yes.

13 "Question: And do you know what
14 the water source was for these tanks?

15 "Answer: Yes.

16 "Question: Can you please tell
17 me.

18 "Answer: I know of two water
19 points. One was south by Courthouse
20 Bay, and the other one was at the
21 field depot in the industrial area."

22 Did I read that correctly?

23 A Yes.

24 Q Okay. Have you read this document before?

25 A Yes.

1 Q In its entirety?

2 A I believe so. Again, I won't swear to
3 anything.

4 Q Okay. Were you aware of Mr. McElhiney's
5 reference to water buffalo filling points being at
6 multiple locations on Camp Lejeune?

7 A Yes.

8 Q Did you acknowledge that in your report?

9 A Yes.

10 Q Okay.

11 A I acknowledged there were other water
12 points, the main one still being at Industrial
13 Point, which had the biggest and the best.

14 Q Okay.

15 A No disagreements, there were multiple ways
16 that you could fill the water buffaloes.

17 Q Okay.

18 A Including using fire hydrants if you were,
19 some will say, silly enough to take a fire hose and
20 try to load that.

21 Q I believe that came from Jerry Ensminger,
22 correct?

23 A I believe so.

24 Q Okay.

25 A But there's no doubt that there are

1 different ones, but again, much like what we
2 discussed in terms of facility, the ones at Hadnot
3 Point, where the group that was most responsible for
4 getting water and things like that was at Hadnot
5 Point in the industrial area. Again, a level of
6 degree.

7 Q Understood.

8 (The document referenced below
9 was marked Deposition Exhibit 20 for
10 identification and is appended
11 hereto.)

12 BY MR. GIBBONS:

13 Q Introduce Exhibit 20.

14 MR. GIBBONS: Did someone just speak?

15 (No response.)

16 BY MR. GIBBONS:

17 Q Dr. Longley, do you recognize Exhibit 20?

18 A Yes.

19 Q Okay. And what is Exhibit 20?

20 A Urquhart's deposition.

21 Q Okay. Have you seen that document before?

22 A I've seen the document, yes.

23 Q Okay. And did you review Mr. Urquhart's
24 deposition in its entirety?

25 A I believe so.

1 Q Okay, please turn to page 74. Line 5.

2 "Question: Was there a place
3 where water buffaloes typically got
4 filled?

5 "Answer: Yes. Different places.
6 Throughout Camp Lejeune, they had
7 water stations throughout
8 Camp Lejeune. So wherever your
9 closest water site was, you went and
10 got it filled. But we always fill --
11 before an operation we always knew how
12 many water buffaloes it was going to
13 take to do that, to supply the
14 operation. So we would bring enough
15 water buffaloes to supply that
16 operation. And all those is filled
17 from Second Combat Engineers staging
18 area."

19 Did I read that correctly?

20 A Yes.

21 Q The Second Combat Engineers staging area is
22 at Courthouse Bay; is that correct?

23 A I don't know that.

24 Q Okay. Would that be a verifiable fact?

25 A I'm sure it would be.

1 Q Okay. If I represented to you that the
2 second engineer battalion -- second combat engineer
3 battalion was based out of Courthouse Bay, would
4 this imply that water buffaloes for operations were
5 filled at Courthouse Bay?

6 A It would.

7 Q Okay.

8 A Although I've heard others, like Jerry
9 Ensminger, comment to the contrary.

10 Q Okay. What did Jerry Ensminger say?

11 A It was mainly filled at the industrial,
12 which was the second support group, I believe.

13 Q Okay. The second service -- Force Service
14 Support Group?

15 A Yes.

16 Q Okay.

17 (The document referenced below
18 was marked Deposition Exhibit 21 for
19 identification and is appended
20 hereto.)

21 MR. GIBBONS: We are going to introduce
22 Exhibit 21.

23 BY MR. GIBBONS:

24 Q Dr. Longley, do you recognize this exhibit?

25 A Yes.

1 Q Okay. What is it?

2 A The deposition of General Zinni.

3 Q Okay. Have you read this document before?

4 A Yes.

5 Q Okay. Did you read it in its entirety?

6 A I believe so.

7 Q Okay.

8 A It has been a while.

9 Q Okay. Please go to page 62, line 11.

10 "Question: Do you know if the
11 Infantry Training Regiment had its own
12 water buffaloes while you were there?

13 "Answer: Yes. Out of Camp
14 Geiger we were supported about the
15 regiment and they had their own
16 facilities out there.

17 "Question: Okay. Did those
18 water buffaloes fill up at Hadnot
19 Point or were there fill-up points
20 closer to Camp Geiger?

21 "Answer: I think there was -- as
22 I remember, there were fill-up points
23 out at Camp Geiger. Pretty
24 self-contained out there.

25 "Question: So would it be

1 correct to say that there were
2 multiple places on Camp Lejeune
3 military installation that had their
4 own water buffalo fill points?

5 "Answer: I think. Yes. I think
6 so. I don't think there was any one
7 primary point unless you were main
8 side and you were supporting the
9 division."

10 Did I read that correctly?

11 A Yes.

12 Q Okay. For reference, "main side"
13 references the Hadnot Point industrial area,
14 correct?

15 A Correct.

16 Q Okay. Would you agree that this indicates
17 that water buffaloes to support the School of
18 Infantry, or the Infantry Training Regiment, would
19 have been filled at Camp Geiger?

20 A According to General Zinni, yes.

21 Q Okay.

22 A But I would also go back over to page 33
23 and line 17 and point out question -- or line 14:

24 "Do you have personal knowledge
25 of where those water buffaloes would

1 come from if they were going to meet
2 you in the field?

3 "Answer: Normally they came from
4 our logistics command, which in those
5 days was a 4th service support group,
6 members of the division of a wing of
7 the 4th service support group in our
8 organization. They were located at
9 Hadnot Point, the industrial area."

10 Q Okay. Would that indicate conflicting
11 testimony within the same deposition?

12 A No.

13 Q No?

14 A No. Because he was talking about the
15 larger groups that were going out in the field
16 versus just the one, the regiment working at Camp
17 Geiger.

18 Q Okay.

19 A So field exercises would have been
20 supported by the Hadnot Point standpipes.

21 Q Okay.

22 A Again, a different smaller group would have
23 been supported by the Camp Geiger one.

24 Q Okay. Do you know where the 4th service
25 support group is?

1 A Industrial area, I believe.

2 Q Okay.

3 A I would have -- we would have to get a
4 confirmation on that.

5 Q Okay. I'll represent to you that there is
6 no 4th service support group.

7 A Okay. I think he meant 2nd.

8 Q Yes.

9 A If I was guessing, it was 2nd.

10 Q Would that underscore that there are memory
11 lapses with passage of time that can present in
12 depositions?

13 A Always.

14 Q Okay. And that's something that would be
15 factored into consideration by a historian, correct?

16 A Yes.

17 Q Okay. But not necessarily directly
18 mentioned as a shortcoming of deposition testimony,
19 correct?

20 A Not necessarily.

21 Q Okay.

22 A Then you weigh against all the different
23 factors.

24 Q Okay.

25 A Because I think you would see others

1 probably say to the order it was the 2nd service
2 group out of Hadnot Point that was providing many of
3 those, including the boat fill.

4 Do we have much longer? I only ask because
5 I could use a break.

6 MR. GIBBONS: We can take a break, that's
7 fine.

8 THE WITNESS: Okay.

9 VIDEO OPERATOR KELLEY: This is the end of
10 Media File Number 6. We are now going off the
11 record. The time is 5:30 p.m.

12 (Recess taken.)

13 VIDEO OPERATOR KELLEY: This is the
14 beginning of Media File Number 7. We are now going
15 on the record. The time is 5:45 p.m.

16 BY MR. GIBBONS:

17 Q Dr. Longley, I want to turn back to your
18 March 17th report. This is Exhibit 5. On page 40,
19 your conclusion. It says:

20 " In conclusion, I used a normal
21 and acceptable methodology. I
22 conducted numerous hours of research
23 in different archives, including
24 assembling items that were cited in my
25 reports as well as cataloging ideas

1 and stories that corroborated many of
2 my assertions but never made it into
3 the reports."

4 Did I read that correctly?

5 A Yes.

6 Q "This is part of the professional
7 practicing historian's process. I
8 have closely followed standards and
9 methods of reporting information while
10 using a variety of methodological
11 tools including oral histories, but
12 also others."

13 Did I read that correctly?

14 A Yes.

15 Q Okay. I want to talk about that. So what
16 are some examples of materials that you might have
17 assembled or cataloged but didn't make it into the
18 report?

19 A Those, such as the ones we discussed early
20 on on Quantico. A lot of the materials that were
21 very interesting, very informative, but not
22 necessarily directly related to the report.

23 Q Okay. We will get to your invoices in a
24 minute because I know that has a little bit of
25 detail about what you did in Quantico.

1 A Yeah.

2 Q But so can you talk to me about, like, what
3 were some examples of these items that didn't make
4 it into your report that were still informative?

5 A For example, how they did POW training at
6 Camp Lejeune in response to the Korean War.

7 Q Okay. That's prisoner-of-war training?

8 A Prisoner-of-war training because we know in
9 the Korean War a lot of U.S. soldiers,
10 unfortunately, acted very poorly when they were
11 confined in the Chinese and the North Korean camps.
12 So that was very interesting.

13 Again, I did use the one, like, on the race
14 riots, but that was just more of a sentence or so.

15 So, you know, there were photos of the
16 chapels. A lot of them were redundant. So, of
17 course, they didn't make it in. But they were
18 reviewed.

19 Q Okay. When you say that there was a
20 sentence or two that you used the race riots you
21 said before, that's a sentence or two in one of your
22 reports?

23 A In the first report.

24 Q Was that footnoted or cited?

25 A Yes.

1 Q Okay. Do you recall specifically which
2 one?

3 A I can give it to you.

4 Q Okay.

5 A Just a minute -- just a moment.

6 MR. HUGHES: Look at --

7 THE WITNESS: Page 9.

8 MR. HUGHES: Page 9.

9 THE WITNESS: Yeah.

10 MR. HUGHES: Footnote 18.

11 MR. GIBBONS: Thank you.

12 BY MR. GIBBONS:

13 Q So that would be an example of a material
14 that you did review that did make it into your
15 report, correct?

16 A It did. There were many materials like
17 that. But then again, some of them were redundant.
18 I would have to go back and review those notes of
19 the -- what I took. Quantico was one of the first
20 places I went months ago and so I would have to
21 review what I did. I have them.

22 Q Okay. So you didn't necessarily take notes
23 that you would be able to refer to or reference now
24 with all those additional materials that didn't make
25 it into your report, correct?

1 A No.

2 Q Okay.

3 A I have a listing of the boxes and things
4 that were examined, but I don't have -- I didn't
5 take notes if they weren't relevant.

6 Q Okay.

7 A And it might be different if I went back
8 now and examined those same materials, they might
9 have a different meaning after all the work that
10 I've done to this point. But it was the first
11 research trip.

12 Q The list of all the boxes that you kept, do
13 you know if that's been produced in this litigation?

14 A That, I don't know.

15 Q Okay.

16 A It is available. I'm more than willing to
17 provide it.

18 Q Okay.

19 MR. GIBBONS: Counsel, I'm going to request
20 a copy of those records after this deposition.

21 MR. HUGHES: If he has them, we will get
22 them and produce them.

23 THE WITNESS: Yeah. That's not a problem.
24 I'll have to double-check to make sure they are
25 still -- you know, where they are.

1 MR. GIBBONS: Okay. Great.

2 (The document referenced below
3 was marked Deposition Exhibit 22 for
4 identification and is appended
5 hereto.)

6 BY MR. GIBBONS:

7 Q Let me introduce Exhibit 22. This is a
8 list of invoices that were produced this morning.

9 Dr. Longley, does this appear to be a
10 complete and accurate list of the invoices you
11 submitted so far in this litigation?

12 A Just a moment.

13 Yes.

14 Q Okay. I just have a question about a few
15 entries here.

16 A Uh-huh.

17 Q Beginning with the first one, your August
18 1st invoice for July work. Thursday, July 11th,
19 2024, "Meeting with research legal group." Can you
20 describe what that means?

21 A Meeting with the team that was put in
22 charge -- if I remember right, Zach and Leslie -- to
23 discuss going further. I can't recall --

24 Q Okay.

25 A -- per se what the conversation was or

1 anything like that.

2 Q Okay. I don't want you to go into attorney
3 work product or privileged communications.

4 A Right.

5 Q Did you have follow-up meetings with those
6 attorneys?

7 A Yes.

8 Q Okay. Friday, July 19th, "Zoom meeting
9 with former congressional staffer and RAND expert."

10 A Uh-huh.

11 Q Do you recall what that was?

12 A Yes.

13 Q What was it?

14 A It was a discussion with Heather Salazar,
15 who was a former member of a congressional committee
16 that oversaw elements related to PACT ACT and
17 Camp Lejeune. She now works for the RAND
18 Corporation. She was explaining to me sort of the
19 long history of legislation.

20 Q Okay. Did the notes from that conversation
21 make it into your reliance materials?

22 A I'd have to look.

23 Q Okay. You didn't cite it directly in any
24 of your reports, though?

25 A No, no.

1 Q Okay.

2 A It didn't prove to be -- since the majority
3 of my work was not about what happened after 1987,
4 it was more for context.

5 Q Okay. The context of understanding --

6 A The case.

7 Q -- why we got to this point in the
8 litigation?

9 A Yes.

10 Q Okay.

11 A Because when I started, I didn't have a
12 great understanding of it, as you might expect.
13 This particular topic.

14 Q Okay.

15 A You know, I knew about Camp Lejeune, I knew
16 about the water cases, but I didn't have the detail
17 that hopefully I possess now.

18 Q Okay. Did you find it helpful to know the
19 context of the litigation?

20 A Yes.

21 Q Okay. Why was that relevant for your
22 reports?

23 A Well, for example, she explained to me that
24 in the original PACT ACT, there had been a --
25 something -- well, the final legislation had a

1 waiver that said basically the VA could go back and
2 subtract what you'd done in terms of -- which did
3 not exist until the last moment.

4 Q Okay.

5 A That was just interesting to me. Again,
6 when you are starting out, you don't know all the
7 questions to ask.

8 Q Fair enough.

9 July 26, 2024, "Conversation with Chief
10 Marine Corps Archivist John Lyles. Reading and
11 taking notes on digital archive project and theses."

12 A Yes.

13 Q Sorry, is that two separate entries?

14 A Yes.

15 Q Okay. Focusing on the conversation with
16 Chief Marine Corps Archivist John Lyles, did you
17 take any notes from that --

18 A No.

19 Q -- conversation? Okay.

20 A We started the finding aid. He took lead
21 on that matter of saying, all right, here is what we
22 have got on Camp Lejeune.

23 Q Okay.

24 A And then reading and taking notes on a
25 digital archive project and thesis. I'm trying to

1 remember, is this the one that was at Quantico. Let
2 me look at the dates on the back.

3 Q They all appear to have occurred on
4 July 26th, July 28th, July 29th, July 30th.

5 A Okay. I traveled to Quantico.

6 So this was -- no, this was separate. The
7 reading and the notes on the digital archive, what
8 I'm referring to there is the seat -- it is the
9 JP -- the online sources.

10 Q "The Few, The Proud, The Forgotten"?

11 A Huh?

12 Q The Few, The Proud --

13 A No, no. The one that we got the JP,
14 whatever, Ls. You know, where we found these kind
15 of materials. That was the online provided by
16 the -- that had The Globe, it had some of these
17 other materials.

18 Q Ahh. Okay. Archival materials.

19 A Yes, archival materials. Sorry.

20 Q Got it.

21 You referenced a finding aid, what was
22 that?

23 A Where is that?

24 Q You said earlier in one of your answers you
25 said -- you said when you were responding to your

1 conversation John Lyles, you said something about a
2 finding aid.

3 A Yes.

4 Q What is that?

5 A A finding aid is what is used in the
6 archives that contains what's available in the
7 archives.

8 Q Okay.

9 A So Dr. Lyles was referring me to that.

10 Q Okay.

11 A And then he was starting to collect
12 materials to provide me what was available.

13 Q Okay.

14 A That I would use when I traveled to
15 Quantico.

16 Q Okay. And then I believe you in your
17 March 17th report criticized Dr. Brigham for not
18 producing the reliance material or recording of his
19 conversation with Mr. Lyles as well.

20 A I think I critiqued not having, like, an
21 oral history, like, he only took notes.

22 Q Of a conversation with Dr. Brigham and
23 Mr. Lyles, correct?

24 A Yeah. He did not record it. He did not
25 make -- as I remember right.

1 Q Okay. Was your -- is it your position that
2 that should have been recorded as an oral history
3 under Dr. Brigham's definition?

4 A Under their definitions, yeah. Not under
5 what I would say as required.

6 Q Okay. What information would Mr. Lyles
7 have that would necessitate an oral history?

8 A Just the history of what's available.

9 Q Okay.

10 A Yeah.

11 Q But nothing about the activities on
12 Camp Lejeune itself, not from his personal
13 recollection?

14 A Not necessarily.

15 Q Okay.

16 A I don't think -- I don't remember John's
17 background.

18 Q Okay.

19 A I don't think he was in the Corps, but I
20 don't know that for sure.

21 Q Okay. Moving to your October 1st invoice.

22 A Okay.

23 Q Hold on a second.

24 Tuesday, September 10th, "Tour of base with
25 Mike Partain and Jerry Ensminger."

1 A What date was that again?

2 Q Tuesday, September 10th.

3 A Okay. I'm sorry, I thought you jumped over
4 to October.

5 Q Okay.

6 A Yes.

7 Q Okay. And then on -- sorry. Jumping back,
8 "Sunday, September 1st, Transcribing notes from an
9 oral history and reading from The Globe."

10 Did I read that correctly?

11 A Yes.

12 Q Which oral history was that?

13 A I believe that was the Howard.

14 Q Okay.

15 A But I won't guarantee that. I would have
16 to go back and look at the notes.

17 Q Okay. So you did transcribe notes from the
18 oral history then?

19 A Yeah. I typed them out.

20 Q Okay. Those were the ones that you
21 provided in early January?

22 A I believe so.

23 Q Okay. Going to your November 1st invoice,
24 Wednesday, October 30th, "Online meeting with
25 membership committee."

1 What was that?

2 A I believe that was probably Zach and
3 Leslie, but I won't -- I can't guarantee it.

4 Q Membership, meaning plaintiffs' membership?

5 A Right.

6 Q Okay.

7 A Given that there are a number of firms
8 represented.

9 Q Okay. And then is that -- what is Thursday
10 October 10th, 2024, "Meeting with leadership team"?

11 A Same kind of thing.

12 Q Okay.

13 A I probably just used a different name.

14 Q January 1st, 2025, invoice.

15 A Okay.

16 Q Tuesday December 3rd, 2024, "Meeting with
17 leadership team on rewriting narrative and
18 research." That's also meeting with the attorneys?

19 A No. The meeting with the leadership team
20 should just be -- and then the second part is
21 rewriting narrative and research.

22 Q Okay.

23 A So those are two separate things. They
24 just ran together.

25 Q Okay. On Saturday, December 21st, 2024,

1 "Meeting with research team"?

2 A Yes.

3 Q What is that?

4 A That was a meeting with John, myself, Mike
5 Partain, and Jerry Ensminger to discuss, I think, my
6 report.

7 Q Okay. You were already in receipt of
8 Dr. Brigham's report at that time as well?

9 A I would think so. Yes. I'm saying I
10 already reviewed -- starting the 19th and the 20th
11 reviewing the government historian's report.

12 Q Okay.

13 A So I was working on preparing a response.

14 Q Okay. And then so you were -- did you
15 review the Brigham report with Mike Partain?

16 A No.

17 Q Okay. Did you discuss it with Jerry
18 Ensminger?

19 A We probably discussed it, but not reviewing
20 it per se.

21 Q Okay. Do you know if they have read
22 Dr. Brigham's report?

23 A I don't know for sure.

24 Q Okay.

25 A I would think so, but I don't know for

1 sure.

2 Q Okay. Then the February 1st invoice, you
3 have got Tuesday, January 7th, doing oral histories,
4 one hour. Who were those oral histories with?

5 A Should have been just doing oral history,
6 and I believe that was Jerry Ensminger.

7 Q Okay. You did not record or transcribe
8 that interview, correct?

9 A I think I took notes, but I don't -- I
10 would have to go back and check.

11 Q Okay. Were the notes from that oral
12 history produced to your counsel?

13 A I'd have to check.

14 Q Okay.

15 MR. HUGHES: Not to interject, but, Hanley,
16 we produced a couple pages of that, I think.

17 THE WITNESS: Are we done with this?

18 BY MR. GIBBONS:

19 Q I think I had a couple more questions. I
20 just want to make sure I got this right.

21 A Okay.

22 (The document referenced ` was
23 marked Deposition Exhibit 23 for
24 identification and is appended
25 hereto.)

1 MR. GIBBONS: Okay. Introducing
2 Exhibit 23.

3 BY MR. GIBBONS:

4 Q Dr. Longley, do you recognize this exhibit?

5 A Yes.

6 Q Are these the notes you were just referring
7 to?

8 A Yes.

9 Q This is the sum total of all the notes and
10 thoughts that you had on the interview?

11 A Yes.

12 Q Okay. Did you take notes during your
13 March 10th oral history with Jerry Ensminger and
14 Mike Partain?

15 A No.

16 Q You just recorded it?

17 A We recorded it.

18 Q Okay.

19 A It followed traditional forms.

20 Q Okay. Do you not typically take notes in
21 oral histories you are recording?

22 A No. I usually try to focus --

23 Q Okay.

24 A -- because I know they are going to be
25 transcribed typically.

1 Q Okay.

2 A It is a very different approach. Different
3 beast.

4 Q Let me talk about that a little bit more.
5 In what way is there -- do you have a preference
6 between recording versus taking notes during the
7 fact?

8 A It depends on the person.

9 Q Okay.

10 A Yeah. And whether I think the person that
11 feels comfortable being recorded versus someone that
12 might not feel as much.

13 Q Okay. I was wrong, we are done with this
14 exhibit.

15 A Okay.

16 (The document referenced below
17 was marked Deposition Exhibit 24 for
18 identification and is appended
19 hereto.)

20 BY MR. GIBBONS:

21 Q Introducing Exhibit 24 to the record.
22 Dr. Longley, do you recognize this document?

23 A Yes.

24 Q Okay. What is it?

25 A It's the oral history, and I misstated

1 earlier when I said they were separate. Oral
2 history with Mike Partain.

3 Q Okay.

4 A Via Zoom.

5 Q Okay. So am I correct in understanding,
6 then, that this oral history was taken concurrent
7 with Jerry Ensminger?

8 A Yes.

9 Q So they were both present in the call?

10 A Yes.

11 Q Okay.

12 A I just forgot and misstated earlier.

13 Q Okay. And this is the sum total of your
14 notes and lack of recording transcript --

15 A Right.

16 Q -- for the oral history --

17 A Right.

18 Q -- of Mike Partain?

19 A Yeah.

20 Q Okay.

21 I want to talk about Jerry and Mike again.
22 I know we talked about them a lot.

23 So Mike Partain, did he ever email you
24 sources to use for your reports?

25 A I don't remember.

1 Q Okay.

2 A I don't remember. He could have and I just
3 don't have a memory of that. I mean, he probably is
4 the one that informed me about his website. I just
5 don't remember.

6 (The document referenced below
7 was marked Deposition Exhibit 25 for
8 identification and is appended
9 hereto.)

10 MR. GIBBONS: Okay. I'm going to introduce
11 Exhibit 25.

12 BY MR. GIBBONS:

13 Q Dr. Longley, do you recognize this email?

14 A Yes, I do now.

15 Q Okay. What email is this?

16 A Just Mike making some recommendations on
17 things to look at.

18 Q Okay. Were there any materials that were
19 attached to the email?

20 A I don't believe so.

21 Q Okay.

22 A These were just notes.

23 Q Okay.

24 A Yeah. I don't remember any attachments.

25 Q Okay. And this occurred on January 14th,

1 2025, correct?

2 A Correct.

3 Q And that was after your, I believe, second
4 oral histories with Mike Partain and Jerry
5 Ensminger?

6 A I believe that's what this was a follow-up
7 email to, things that they may have gotten to
8 include.

9 Q Okay.

10 A Or I asked them for clarification.

11 Q Okay. So when you had the March 10th oral
12 history with Mike Partain and Jerry Ensminger, had
13 they already seen your two reports?

14 A I believe so, but I don't know for sure.

15 Q Okay. Do you know if they had seen any of
16 Dr. Brigham's reports?

17 A Don't know for sure.

18 Q Okay. I'll represent to you that
19 Mr. Ensminger made reference to Dr. Brigham's report
20 and some of the citations in it --

21 A Okay.

22 Q -- which would imply that he had, in fact,
23 read the report prior to your interview, correct?

24 A Yeah. Again, I don't remember.

25 Q Okay. When such a circumstance occurs, how

1 are you able to distinguish between what is a memory
2 that is natural for the interviewee versus what is a
3 learned memory or a false memory that they have
4 gleaned from other information in the meantime?

5 A Right. A lot of it is, again, trying to
6 corroborate with other materials. Not to just rely
7 on the one oral history. Oral history is not
8 acceptable as an individual one source.

9 Q Okay.

10 A It has got to be corroborated. It has got
11 to be examined. It has got to be contributing to
12 other elements or have other elements contributing.
13 Rarely would I say oral history can stand alone.

14 Q Okay. Stepping away from oral history
15 again. So Mike Partain's website I believe is
16 actually Jerry Ensminger's website and then Mike
17 Partain took it over and modernized it, correct?

18 A I have no idea on that.

19 Q Okay.

20 A I have not heard. Again, I know that it
21 was related to a public history thesis, I believe,
22 at Central Florida.

23 Q Okay. Is that Mike Partain's thesis?

24 A I believe so. Yeah, Jerry has not, I don't
25 think, pursued advanced education. Mike's got a

1 master's, I believe.

2 Q Okay. When you relied on "The Few, The
3 Proud, The Forgotten," the timeline, did you rely on
4 any of the documents that were linked in the
5 timeline?

6 A It's been a long time. I don't remember.

7 Q Okay.

8 A Yeah. I would think I would have examined
9 the documents also.

10 Q Okay.

11 A But I don't recall which ones and what
12 order.

13 Q Okay. I believe in your January 13th
14 report, you criticized some of Dr. Brigham's sources
15 because you noticed that they weren't present on
16 "The Few, The Proud, The Forgotten." Is that
17 correct?

18 A I don't remember on that.

19 Q Okay.

20 A If you can bring that up, and I'll look it
21 over.

22 Q Let's go back to it. That's Exhibit 4.
23 Page 5. Third paragraph.

24 "The Partain website timeline
25 would have shown the state of

1 historical knowledge as of 2012 to any
2 government specialist who wanted to
3 know. The website showed the known
4 facts as of 2012 that public
5 historians on the contamination
6 subject were then aware of. This
7 raises questions as to whether all of
8 the documents now cited by Brigham in
9 2024 were not made available by the
10 government in years -- in the years
11 past."

12 Did I read that correctly?

13 A Yes.

14 Q Okay.

15 "It raises questions as to why
16 all of the information provided by the
17 government to Brigham today was not
18 provided to Partain years ago."

19 Did I read that correctly?

20 A Yes.

21 Q Okay. And, "Again, the government's own VA
22 experts on Lejeune were relying on this very website
23 or factual background."

24 Did I read that correctly?

25 A Yes.

1 Q How did you know the documents weren't on
2 "The Few, The Proud, The Forgotten"?

3 A I believe I was given that information by
4 Mike himself.

5 Q Okay.

6 A He is the repository of the information and
7 knows the timeline on that.

8 Q Okay. As a plaintiff, does Mr. Partain
9 have access to all of the documents produced in this
10 litigation?

11 A Not to my knowledge.

12 Q Okay. Did you corroborate that fact at
13 all?

14 A I wasn't able to corroborate that.

15 Q Okay. Would that be a form of oral history
16 then?

17 A Yes.

18 Q So an uncorroborated form of oral history?

19 A Yes.

20 Q Okay. To your knowledge, how long has Mike
21 Partain been engaged in the Camp Lejeune water
22 issue?

23 A I should know this. I just watched the
24 documentary Semper Fi again. I think it's at least
25 been a decade, but I don't know the exact number.

1 Q Okay. Well, if his report -- or if his
2 website was accurate as of 2012, it would have had
3 to have been at least 13 years from now presumably
4 before that, right?

5 A Correct.

6 Q That's a fairly long period of time, would
7 you agree?

8 A I would agree.

9 Q Okay. And as we discussed many times,
10 Mr. Partain is a plaintiff in this litigation,
11 correct?

12 A Correct.

13 Q Do you see why the historian might be
14 concerned with the veracity of documents that are
15 available on a website maintained by someone that
16 has been engaged in the history project for years
17 and is now a plaintiff when the litigation involves
18 the subject that he opined on for so many years?

19 A Yes.

20 Q Okay. Did you acknowledge that in your
21 reports?

22 A No. But, as we discussed earlier, it
23 doesn't require acknowledgment in the process of
24 your report. That is something you try to weigh as
25 you go.

1 Q Okay. And that's why you highlighted that
2 Mr. Partain and Mr. Ensminger had testified before
3 congress numerous times, correct?

4 A Right.

5 Q Did you ever characterize them as
6 activists?

7 A I don't think I used that term.

8 Q Okay.

9 A I don't think Mr. Brigham did either.

10 Q I don't recall whether or not he did or
11 not.

12 A Yeah.

13 Q I'm just trying to understand what -- your
14 understanding of the potential biases of Mike
15 Partain.

16 A No, I understand exactly what the potential
17 biases are. I understand they are plaintiffs. I
18 understand they have a vested interest. I
19 understand -- and like you say, typically I would
20 work hard to corroborate on general information.

21 Q Okay. But nonetheless, there were
22 assertions in your report from Michael Partain that
23 were uncorroborated but still made it into your
24 report?

25 A Yes.

1 Q Okay. Is that typical practice in your
2 report history?

3 A When you are under the gun in terms of
4 meeting deadlines, sometimes you don't have the
5 chance to go back and go line by line to do so. I
6 also didn't have an army of researchers to help me
7 in this case.

8 Q Okay.

9 A What you see is one person's work.

10 Q Okay.

11 A Again, time.

12 Q Would you agree, then, that when time and
13 monetary resources are limited, it is okay to take
14 methodological shortcuts?

15 A I didn't see it is a methodological
16 shortcut. I saw it as one where I'm going to put
17 this down. I had hoped to go back and corroborate
18 it. Didn't have time to do so because we ran up
19 against a deadline.

20 Q Okay.

21 A So, no, normally I don't -- I don't believe
22 in shortcuts. I don't think you will find that as a
23 pattern in any stretch or form.

24 Q Okay. That's fair.

25 A Uh-huh.

1 Q Did you footnote or otherwise acknowledge
2 the source for the assertion that Dr. Brigham or the
3 government had not produced all these documents
4 prior to this litigation?

5 A I don't believe so.

6 Q Okay.

7 A Again, up against a deadline, I would
8 prefer -- again, I would love to have more time.
9 And, again, I would love to have an army of
10 researchers to delegate this to.

11 Q You should consider becoming a full-time
12 professional expert.

13 A It is more lucrative than my job. I've
14 already seen the numbers. I'm like, whoa. He made
15 the right choice getting out of academia.

16 MR. HUGHES: Objection.

17 For the sake of your mental sanity, I would
18 not become a full-time expert.

19 THE WITNESS: Okay. I'm not qualified to
20 go outside of my areas of expertise. I have a few,
21 and I try to stay in my lane.

22 BY MR. GIBBONS:

23 Q Okay. Let's go back to Exhibit 3, which is
24 your December 9th -- I'm sorry, December 7th, 2024,
25 report. I'm sorry, wrong exhibit on my end.

1 Okay. If you go to page 34. Okay. In the
2 top left-hand corner, there's a photo of two
3 individuals standing on a, and by a, water buffalo,
4 correct?

5 A Yes.

6 Q Okay. And the caption reads, "Marines fill
7 water buffalo, Hadnot Point," correct?

8 A Yes.

9 Q Is there any other citation for the source
10 of that on this page?

11 A No.

12 Q Okay. Was any other source provided in the
13 reliance materials for this report?

14 A I can't remember on that.

15 Q Okay.

16 A It was part of the -- it was in the --
17 because I remember seeing this. The mistake, of
18 course, was saying it was at Hadnot Point when it
19 wasn't.

20 Let's see. But it was on the seal --
21 again, I'm blanking right now -- on the seal.

22 MR. GIBBONS: Introduce Exhibit 26.

23 (The document referenced below
24 was marked Deposition Exhibit 26 for
25 identification and is appended

1 hereto.)

2 BY MR. GIBBONS:

3 Q Dr. Longley, are the individuals in this
4 photograph Marines?

5 A If I'm not mistaken, Marine Reserves.

6 Q Okay.

7 A No, these are Army.

8 Q Okay.

9 A I can tell by the uniforms.

10 Q Okay.

11 A But it was a water buffalo that -- we were
12 trying to highlight what a water buffalo was to give
13 a visual to readers.

14 Q Okay. I'll represent to you the Exhibit 26
15 is a forensic analyst pull of the website pictured,
16 which is a National Guard website.

17 Did you recognize this website?

18 A No. I didn't use this website to get the
19 photo.

20 Q Okay. Where did you receive the photo
21 from?

22 A It was in the list of photos that I had
23 access to provided by the lawyers. There was a list
24 of photographs.

25 Q Okay. So this image was provided to you by

1 attorneys then?

2 A Yes.

3 Q Okay. Do you recall which attorneys
4 specifically?

5 A No.

6 Q Okay.

7 A I actually think it was part of -- on our
8 list of sources, and I just went through it and
9 found it.

10 Q Okay.

11 A And was looking for, again, a sort of
12 last-minute example of what a water buffalo looks
13 like. Usually the last thing I do in any kind of
14 research project is photos and audiovisual-type
15 things.

16 Q Okay.

17 A You write the narrative, then you put the
18 other parts in.

19 Q Okay. Did you originally have a photograph
20 of Marines filling a water buffalo at that point?

21 A I had some in The Globe where actually it
22 did, but there was such a poor quality, I was
23 looking for something cleaner.

24 Q Okay. Let's talk a little bit more about
25 the photos list that you were provided.

1 What kind of photos were in this list?

2 A They were photos from Camp Lejeune. And
3 you know, like the chapel, like the theater. I
4 don't remember all of them.

5 Q Okay.

6 A Again, that was a last-minute -- again, if
7 I'm going to do a project, I'm going to write the
8 narrative first then try to pull the audiovisual in.

9 Q Okay. Understood.

10 A And that was just a mistake of -- it would
11 have been probably fine if I'd just say here's an
12 example of a water buffalo.

13 Q Right. And I acknowledge that you have an
14 errata sheet now --

15 A Right.

16 Q -- where you have acknowledged a mistake in
17 your third report.

18 A Right. And mistakes do happen.

19 Q Mistakes do happen. I just wanted to
20 clarify for the record the source of this photo and
21 where you received it from.

22 A Right.

23 Q But did you ever corroborate the photo?

24 A No.

25 Q Okay.

1 A Again, I know what a water buffalo looks
2 like.

3 Q Right.

4 A You know.

5 Q But, I mean, you very quickly pointed out
6 that the uniforms on these individuals --

7 A Once I looked closer. I mean --

8 Q -- Army --

9 THE REPORTER: Gentlemen, gentlemen.
10 You're speaking over each other.

11 THE WITNESS: Once I looked closely at the
12 photo, you could tell by looking at the person down
13 that it was Army.

14 BY MR. GIBBONS:

15 Q Okay. And when did you add this photo into
16 your report relative to when it was disclosed?

17 A I'm sorry?

18 Q When did you add this photo and caption
19 into your report relative to when it was disclosed?

20 A You mean --

21 Q When the report was entered or disclosed.

22 A Probably December 6th as I'm putting the
23 finishing touches.

24 Q Okay.

25 A Much like the mistake like on the Nixon

1 visit to Camp Lejeune.

2 Q Okay.

3 A It was just a last-minute, again, no -- you
4 know, not being supported or anything like that.

5 Q Okay.

6 A Trying to do it last-minute again. Again,
7 you guys believe in deadlines, we don't. Except for
8 our students.

9 Q Okay. And Exhibit 3, would you turn to
10 page 13?

11 A 13.

12 Q Correct. You reference the Nixon photo
13 from Camp Pendleton, correct?

14 A I said the one I listed as him being at
15 Camp Lejeune was actually when he was at Camp
16 Pendleton.

17 Q Okay. On page 13 of your December 7th
18 report --

19 A Uh-huh.

20 Q -- in the lower left-hand corner, you see
21 the photo that we are discussing, the photo of
22 President Nixon. Correct?

23 A Yes.

24 Q And that's a still frame from a video or a
25 film. Correct?

1 A Right.

2 Q Okay. Did you find this photo yourself?

3 A Yes.

4 Q Okay.

5 A From the University of South Carolina.

6 There's a Marine Corps film repository.

7 Q Okay. So you were able to locate the video
8 yourself --

9 A Yes.

10 Q -- and then pull this screenshot?

11 A Yes.

12 Q Okay.

13 A Well, actually, that's the way they had it
14 cataloged.

15 Q That was the photo that appeared when you
16 first found the film?

17 A Yes. I believe.

18 Q Okay.

19 A Again, asking -- I'd have to go back to the
20 website.

21 Q Okay. When you say catalog, you mean the
22 website itself had cataloged, correct?

23 A Yes, I believe so.

24 Q Okay. All right.

25 ///

1 (The document referenced below
2 was marked Deposition Exhibit 27 for
3 identification and is appended
4 hereto.)

5 MR. GIBBONS: I introduce Exhibit 27.

6 BY MR. GIBBONS:

7 Q Dr. Longley, does this appear to be the
8 state of the website when you reviewed it?

9 A Yes. Like I said, I just overlooked it. I
10 guess I had Camp Lejeune on the brain.

11 Q Okay.

12 A I should have thought about Camp Pendleton
13 because San Clemente is 15 minutes from Camp
14 Pendleton.

15 Q Okay.

16 A I just made a simple mistake.

17 Q Okay. I just want to focus on the citation
18 in the report. So the footnote states, "U.S. Marine
19 Corps Nixon's visit to Camp Lejeune 30 October,
20 1971; U.S. Marine Corps Film Repository Research
21 Collections, University of South Carolina."

22 Did I read that correctly?

23 A That is.

24 Q Okay. Where did the 30 October 1971 date
25 come from?

1 A Look at the film date, the note. Possibly
2 April 30th, 1971. So I made a mistake on that too.

3 Q Okay. That's just a very specific date for
4 a random mistake.

5 A Yeah. Well, again, probably just rushing
6 through at the end to get these photos inserted.

7 Q Okay.

8 A Which I've acknowledged in the response and
9 now the errata.

10 Q Okay. It seems like these are rather
11 larger errors for simple mistakes in a report that's
12 about to go before the Court. Would you agree?

13 A No.

14 Q No?

15 A I'd say the audiovisual is usually --
16 again, when I think of things, I don't grade my
17 students on their audiovisuals. I grade them on the
18 substance of their report.

19 Q Okay. Then why include photos and the
20 other audiovisual in your report?

21 A Because it is to give a face to the -- to
22 the narrative.

23 Q Okay.

24 A Try to provide a reader -- and as we
25 discussed earlier, the reader in this case is

1 someone that is probably not as familiar with the
2 materials as, say, a qualified military historian
3 would be.

4 Q Okay. Had we not had Dr. Brigham's team
5 also producing a report in this litigation, what do
6 you think the chances are that you would have caught
7 this error between now and trial?

8 A I would think pretty good because if I had
9 the time, I would have gotten people to review it
10 that were more trained experts, had I had the time.

11 Q Okay.

12 A Again, in a normal publication process, we
13 have multiple editors, multiple copy editors, to
14 help in this process.

15 Q Okay. Are you aware that the United States
16 requested the source material to be produced for
17 this photo?

18 A I don't -- no, I don't.

19 Q Okay. Are you aware that plaintiffs'
20 counsel offered to retract the photo once it came to
21 light that there was no valid source for it?

22 A Yes.

23 Q Okay.

24 A Which we have done. I mean, if I had my
25 way, I would have worked till March and had the

1 three reports come together. That would have given
2 more time to check these things. Again, I didn't
3 have an army of research assistants to double-check
4 these things.

5 Q Understandable. But the fact of the matter
6 is that had Dr. Brigham not pointed this out, this
7 report would have gone to the Court uncorrected.

8 A Not necessarily.

9 Q No?

10 A That's what I'm saying. I would have --
11 like, after today, I will probably go back and
12 reread and start, you know, thinking again through
13 these things.

14 Q Okay.

15 A It doesn't happen in a vacuum.

16 Q Okay. So are there potential additional
17 things you would change in these reports and fill
18 out subsequent errata sheets?

19 A Not to my knowledge right now, but if I
20 were to have something, I would be a person who
21 would own up to it and acknowledge it.

22 Q Okay.

23 A Much like what I did in terms of reread the
24 review on Grunts. Were there a couple of mistakes?
25 Absolutely. Were they changed in subsequent

1 editions? Absolutely.

2 Q Okay.

3 A Because Grunts also was a second edition,
4 and that was -- those mistakes were caught and
5 changed.

6 So given the time and the opportunity, yes.
7 I bet if I went through others' reports and went
8 with a fine-tooth comb, I would probably be able to
9 find some stuff too, even after a good copy
10 editing -- after a good editing, after a good
11 evaluation. Mistakes happen.

12 Q Then on page 10 of your December report,
13 middle of the page on the left-hand side, there's a
14 photograph that's labeled "Water Treatment Plant
15 near Holcomb Boulevard, 1960s." Is that correct?

16 A That is correct.

17 Q And there's no citation provided for that
18 photograph, correct?

19 A I don't believe so.

20 Q Okay.

21 A I think it was included in the -- what do
22 you call it, the list.

23 Q The reliance list?

24 A Reliance list.

25 Q Okay.

1 A And as we've already acknowledged, that
2 should have read 1972, not the 1960s.

3 Q Okay. This is the only time that you
4 referenced the Holcomb Boulevard water-treatment
5 plant in your entire report, correct?

6 A It is. I believe. It was to say, picture
7 to represent what one of the water treatment plants
8 looked like.

9 Q Okay. You understand how that could be
10 confusing or misleading to the Court if it was not
11 corrected?

12 A If not corrected, but it has been
13 corrected.

14 Q Okay. After Dr. Brigham pointed it out.

15 A Yeah. After his probably research
16 assistants found it and pointed it out.

17 Q Along with the photo of the water buffalo?

18 A As -- again, give me 20 research
19 assistants, I bet I could go through with a
20 fine-tooth comb and do the same thing.

21 Q And photo of Nixon?

22 A Yes.

23 Q Okay.

24 A Again, give me 20 research assistants, it
25 could make a difference. And a budget as much as he

1 received.

2 Q At any point did you consider telling the
3 attorneys that retained you that you needed to
4 narrow the scope of your report?

5 A I don't remember, no.

6 Q Okay.

7 A Not to my -- not to my memory.

8 Q Okay. Well, given that the lawyers have to
9 operate on deadlines, would it have been easier to
10 employ more rigorous methodology had you had more
11 time?

12 A I think so.

13 Q Okay.

14 A I think time is always valuable because,
15 for example, normally what I do is I'll write a
16 draft, rewrite it after two weeks, put it aside for
17 a month, come back to it. And it is amazing what
18 you can catch as a result of that.

19 Q Right. That is just not an option in this
20 litigation, correct?

21 A In this litigation, it was not an option.
22 I wish it was, but it wasn't. So, again, hard, fast
23 deadlines versus the academic whirlpool we work on,
24 very soft deadlines.

25 Q Okay. Would you agree that it is better to

1 take a more conservative approach, to have a more
2 limited report that you can sufficiently fact check,
3 cite, and corroborate?

4 A It would be optimal, but not always -- not
5 necessary, but not always an option.

6 Q Okay. And as we talked about, other
7 presidents visited Camp Lejeune --

8 A Uh-huh.

9 Q -- Kennedy, Reagan, outside of the
10 statutory period, FDR.

11 A Right.

12 Q Bill Clinton, Barack Obama.

13 But you didn't use any of those in your
14 first report?

15 A I didn't use them because they weren't
16 within the statutory and I didn't have time to track
17 it down.

18 Again, when it comes to most research
19 projects, you focus on the narrative, then you worry
20 about the audiovisual.

21 Q Okay.

22 A So the mistakes were in the audiovisual,
23 which were done in the latter part of research.

24 Q Using the photo of a water buffalo that you
25 retrieved from plaintiffs' counsel rather than

1 finding yourself, correct?

2 A In this case, yes, because it was a better
3 photo because I did have others from The Globe that
4 I could have used, but they would have been so dark
5 that you couldn't see hardly anything.

6 Q Okay.

7 A The reproductions were not particularly
8 good.

9 Q Were there any other documents that were
10 provided to you by counsel?

11 A No, not directly. I mean, I went through
12 what was made available to me in the CLGA -- JA, you
13 know, database.

14 Q How many photos were available in this list
15 that was provided to you by counsel?

16 A Don't know.

17 Q Ballpark?

18 A Forty.

19 Q Forty, okay.

20 A Maybe. Again, I don't know. I didn't use
21 it extensively.

22 Q But nonetheless, one of those photos did
23 make it into your report?

24 A Yes.

25 Q Uncorroborated?

1 A In this case, uncorroborated.

2 Q Okay.

3 A Or not -- and, again, if I would have
4 been -- had the time to sort of focus on it, I would
5 have said example of a water buffalo.

6 Q Right.

7 A I wouldn't have given it the caption that
8 was chosen.

9 Q Right, but that wasn't what went into your
10 report initially?

11 A Not into my report initially.

12 Q Okay.

13 A Again, mistake. We all make them. Own up
14 to them and move on.

15 MR. GIBBONS: What are we at on the record?

16 VIDEO OPERATOR KELLEY: Six hours, 31
17 minutes.

18 MR. GIBBONS: Okay. Dr. Longley, that
19 concludes my questioning. I'll turn it over to
20 plaintiff counsel for redirect.

21

22 EXAMINATION

23 BY MR. HUGHES:

24 Q Dr. Longley, I'm going to introduce as an
25 exhibit this errata sheet that we had signed this

1 morning.

2 (The document referenced above
3 was marked Deposition Exhibit 28 for
4 identification and is appended
5 hereto.)

6 MR. HUGHES: Thank you.

7 BY MR. HUGHES:

8 Q And so, Dr. Longley, just briefly, you were
9 asked extensively questions about the photo of
10 Nixon, and in your errata sheet you say that it is
11 incorrect and should be deleted, correct?

12 A Yes.

13 Q Then you were asked questions about the
14 Holcomb Boulevard photo which said 1960s, but that's
15 wrong, and the errata sheet modifies the caption,
16 correct?

17 A Yes.

18 Q And then the photo of the water buffalo,
19 which should only have been a demonstrative photo,
20 you acknowledge that in your errata sheet as well?

21 A Yes.

22 MR. HUGHES: Thank you. That's all I have.

23 MR. GIBBONS: Okay. All right.

24 Dr. Longley, that concludes all the questions I have
25 for today's deposition. Once it is ready, you will

1 be provided with a transcript of today's deposition.
2 We ask that you carefully read and correct any of
3 the spellings or misstatements that you believe were
4 captured in the transcript.

5 Do you understand?

6 THE WITNESS: Yes.

7 MR. GIBBONS: Okay. Thank you for your
8 patience in answering my questions today.

9 THE WITNESS: All right.

10 MR. GIBBONS: That concludes today's
11 deposition. Off the record.

12 VIDEO OPERATOR KELLEY: This is the end of
13 Media File Number 7 and concludes today's videotaped
14 deposition of Kyle Longley, Ph.D. We are now going
15 off the record. The time is 6:41 p.m. .

16 (Off-the-record discussion.)

17 MS. HURT: We would like a rough draft.

18 THE REPORTER: Okay. Thank you.

19 Mr. Hughes, do you need a rough draft as
20 well?

21 MR. HUGHES: Don't need a rough.

22 (The proceeding was concluded at 6:41 P.M. PST.)

23 --ooOoo--
24
25

CERTIFICATE
OF
CERTIFIED SHORTHAND REPORTER

The undersigned Certified Shorthand Reporter of the State of California does hereby certify:

That the foregoing oral proceeding was taken before me at the time therein set forth, at which time the witness was duly sworn in by me;

That the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed, said transcript being a true and correct copy of my shorthand notes thereof;

That the dismantling of the original transcript will void the reporter's certificate.

In witness thereof, I have subscribed my name this date:_____.



PAMELA COTTEN, CSR, RDR
Certificate No. 4497
Certified Realtime Reporter

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original transcript with errata sheet per the instructions given to you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

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DECLARATION UNDER PENALTY OF PERJURY

I hereby declare under penalty of perjury that the foregoing is my deposition under oath; are the questions asked of me and my answers thereto; that I have read same and have made the necessary corrections, additions, or changes to my answers that I deem necessary.

In witness thereof, I hereby subscribe my name this _____ day of _____, _____.

KYLE LONGLEY, Ph.D.

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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